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DATA VALIDATION SUMMARY REPORT

2ND FIVE-YEAR CERCLA REVIEW – SOIL SAMPLES

This report is a summary of the data validation and quality control (QC) review conducted for soil samples collected in October 2007 in support of the 2nd Five-Year CERCLA Review for the Monsanto Soda Springs Plant, located in Soda Springs, Idaho. This effort was completed on the behalf of Monsanto Elemental Phosphorous Plant. General Engineering Laboratories (GEL), located in Charleston, South Carolina, performed analyses on all primary, triplicate, and field blank samples. Sanford Cohen and Associates (SCA), located in Vienna, Virginia, was contracted to perform radionuclide analysis on quality assurance (QA) split samples. These laboratories were selected prior to sampling and are proficient in the analysis of radionuclides as requested by the United States Environmental Protection Agency (USEPA) Region 10 and the Idaho Department of Environmental Quality (IDEQ).

Data generated by GEL were validated as specified in the Quality Assurance Project Plan (QAPP) portion of the 2nd Five-Year CERCLA Review Work Plan (MWH, 2007), and as referenced in the *Final Work Plan for CERCLA Five-Year Review* (MWH, 2002). Radionuclide data were validated using applicable guidance specified in *Evaluation of Radiochemical Data Usability* (United States Department of Energy [USDOE], 1997b). Data validation reports were produced for each laboratory Sample Delivery Group (SDG), and are provided in Attachment A.

Soil samples were collected and submitted to GEL where they were homogenized and dried. In addition, 17 equipment rinsate and 17 source water blank samples were collected and submitted to GEL. Seventeen of the primary field samples were selected for triplicate and QA analyses. These samples were homogenized and split into four parts. One part of each sample was submitted to SCA for radionuclide analysis. The remaining three parts were identified as triplicate samples and analyzed by GEL. All sample submittals were made under chain-of-custody protocols.

GEL analyzed the primary samples for Radium-226 (^{226}Ra), Radium-228 (^{228}Ra), and Cesium-137 (^{137}Cs) by Environmental Measurements Laboratory (EML) Health and Safety Laboratory (HASL)-300 Manual, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry) (USDOE, 1997a) and GEL's Standard Operating Procedure (SOP) GL-RAD-A-013 Rev #14. SCA analyzed the QA split samples for Radium-226 by EML HASL 300, Ga-01-R.

Data quality objectives (DQOs) are qualitative and quantitative statements that specify the quality of these data required to meet the goals of site investigation and/or to support decisions made in environmental management activities. Although analytical chemistry DQOs for the October 2007 sampling event were not specified in the Work Plan (MWH, 2007), chemical data generated from field samples are typically evaluated in terms of precision, accuracy, representativeness, completeness, and comparability. The results of laboratory quality control (QC) samples were evaluated against these parameters. QC sample results that fall outside the method- and laboratory-specified control criteria serve to signal unacceptable or biased data that may result in corrective action or qualification of data. The following is a summary review of these data, including data qualification that resulted from the data validation.

Precision and Accuracy

Precision is the degree of agreement among repeated measurements of the same characteristic under the same or similar conditions. Data precision indicates how consistent and reproducible the field sampling or analytical procedures have been. Precision was evaluated based on the results of QC samples collected in the field and created in the laboratory. The percent differences (or drift) calculated from continuing calibration verification (CCV) standards provided information on precision of the analytical system. The calculated relative percent differences (RPDs) for replicate field samples pairs provided information on precision of sampling and analytical procedures.

Accuracy is defined as the closeness of agreement between an observed value and an accepted reference value. Accuracy was evaluated based on recoveries from the laboratory control samples, and sample identification and quantitation assessments.

- All recoveries and RPDs for radionuclide QC sample analysis were within laboratory-established control limits.
- The radionuclide sample identification and quantitation criteria for reporting (that is, the detected activity as compared to the uncertainty and sample-specific minimum detectable activity [MDA] or concentration [MDC]) were acceptable, with the exceptions noted in each data validation report (GEL SDGs 195900, 195902, 196905, 195906, 195907, 195910, and 196017).
- The laboratory rejected three results (Cesium-137 in samples 101107SOMS4-13-0-C(5) and 101307SOMS3-119-1-C(5) and Radium-228 in sample 101307SOMS-100-0-C(5)) because the peaks in these sample did not meet acceptable gamma-spectrometer criteria.

Representativeness

Representative for radionuclide analysis was determined from the laboratory blank data. The normalized absolute difference (NAD) was calculated as follows:

$$NAD = \frac{|[Sample] - [Blank]|}{([Uncertainty_{Sample}^2 + Uncertainty_{Blank}^2])^{1/2}}$$

If the NAD were greater than 2.58, then the reported results were acceptable. If the NAD was less than 2.58 but greater than 1.96, then the data were qualified as estimated. If the NAD was less than 1.96 and the reported concentration were less than two times the uncertainty, then the radionuclide was considered not detected (flagged as UJ) at the reported concentration. Radium-226, Radium-228, and Cesium-137 results that were qualified because of method blank contamination are summarized in each data validation report.

All samples were analyzed within the recommended holding times for radionuclides analyses.

Completeness

All field samples, field blank samples, and QA Split samples were collected and analyzed as specified in the *Work Plan, Field Sampling Plan, Quality Assurance Program Plan, and Health and Safety Memoranda for the 2nd CERCLA Five-Year Review* (MWH, 2007). GEL's

laboratory data were complete for radionuclide analyses. SCA laboratory data were complete with the exception of back-up (raw) data in the laboratory report.

Comparability

Comparability is defined as the confidence with which one data set can be evaluated against another. On this project, comparability was assured by analyzing all samples according to the specified methods and procedures described in the *Work Plan, Field Sampling Plan, Quality Assurance Program Plan, and Health and Safety Memoranda for the 2nd CERCLA Five-Year Review* and via the analysis of QA Split samples. Table 1 provides the results of the QA split samples for Radium-226.

Of the 51 RPDs and 51 duplicate error ratios (see Table 1 for calculation) calculated for Radium-226 for the 17 sets of triplicate and QA Split samples, all but six were within the QAPP-defined acceptance criterion of 35 for duplicates. Three RPDs and two DERs calculated from the results of triplicate samples 101107SOMS4-16-1-C(5), 101107SOMS4-16-2-C(5), and 101107SOMS4-16-3-C(5) and QA Split sample 101107SOMS4-16-4-C(5) and one RPD calculated from the results of triplicate sample 100907SOMS3-99-2-C(5) and QA Split sample 100907SOMS3-99-4-C(5) were greater than 35. The triplicate and QA Split sample results for the 17 sets of soil samples indicate that the Radium-226 data were generally comparable.

Summary of Data Quality

Analytical data generated from soil samples collected in support of the 2nd Five-Year CERCLA Review for the Monsanto Soda Springs Plant were reviewed and validated according to the *USDOE Evaluation of Radiochemical Data Usability*. Except for the three rejected data, and all data are usable as qualified.

References

- MWH, 2002. *Final Field Sampling Plan for CERCLA Five-Year Review Soil and Sediment Investigation*. Monsanto Elemental Phosphorus Plant, Soda Springs, Idaho. Prepared by MWH for Monsanto.
- MWH, 2007. *Work Plan, Field Sampling Plan, Quality Assurance Program Plan, and Health and Safety Memoranda for the 2nd CERCLA Five-Year Review*. Monsanto Elemental Phosphorus Plant, Soda Springs, Idaho. August.
- United States Department of Energy (USDOE), 1997a Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.4 (Po-01-RC: alpha ray spectrometry), 28th Edition, February.
- USDOE, 1997b. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April.

ATTACHMENT A
DATA VALIDATION REPORTS

GEL SDG No. 195900 Radium-226
GEL SDG No. 195902 Radium-226
GEL SDG No. 195905 Radium-226
GEL SDG No. 195906 Radium-226
GEL SDG No. 195907 Radium-226
GEL SDG No. 195910 Radium-226
GEL SDG No. 196017 Radium-226

TABLE 1

**SUMMARY OF TRIPPLICATE AND QA SPLIT SAMPLE RESULTS FOR RADIOLOGICAL PARAMETERS
2ND 5-YEAR CERCLA REVIEW_SOIL 2007**

MONSANTO
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Sample Identification	Laboratory Identification	Sample Type	Chemical Parameter	Laboratory Result (pCi/g)				Validation Result ^a		Precision ^b	
				Result	Uncertainty	Qualifier	MDC	Qual	ReasonCode	RPD (<35)	DER (≤ 1.42)
101107SOMS3-82-1-C(5)	196017001	TRIPPLICATE	Radium-226	1.50	0.260		0.149	C03		5.2	0.09
101107SOMS3-82-2-C(5)	196017002	TRIPPLICATE	Radium-226	1.41	0.221		0.127	C03		11	0.19
101107SOMS3-82-3-C(5)	196017003	TRIPPLICATE	Radium-226	1.45	0.240		0.117	C03		8.6	0.14
101107SOMS3-82-4-C(5)	MWW07-8022-11	QA Split	Radium-226	1.58	0.389		0.508				
101507SOMKMBACK-5-1-C-(5)	196017004	TRIPPLICATE	Radium-226	1.10	0.228		0.154	C03		3.7	0.05
101507SOMKMBACK-5-2-C-(5)	196017005	TRIPPLICATE	Radium-226	1.03	0.271		0.154	C03		2.9	0.04
101507SOMKMBACK-5-3-C-(5)	196017006	TRIPPLICATE	Radium-226	1.34	0.230		0.108	C03		23	0.36
101507SOMKMBACK-5-4-C(5)	MWW07-8022-12	QA Split	Radium-226	1.06	0.309		0.406				
101307SOMS3-119-1-C(5)	196017007	TRIPPLICATE	Radium-226	1.29	0.201		0.121	C03		18	0.29
101307SOMS3-119-2-C(5)	196017008	TRIPPLICATE	Radium-226	1.25	0.197		0.147	C03		15	0.24
101307SOMS3-119-3-C(5)	196017009	TRIPPLICATE	Radium-226	1.26	0.213		0.125	C03		15	0.24
101307SOMS3-119-4-C(5)	MWW07-8022-13	QA Split	Radium-226	1.08	0.301		0.384				
101207SOMS3-89-1-C(5)	196017010	TRIPPLICATE	Radium-226	4.16	0.456		0.156	C03		6.3	0.20
101207SOMS3-89-2-C(5)	196017011	TRIPPLICATE	Radium-226	4.57	0.522		0.190	C03		3.1	0.10
101207SOMS3-89-3-C(5)	196017012	TRIPPLICATE	Radium-226	3.49	0.393		0.140	C03		24	0.76
101207SOMS3-89-4-C(5)	MWW07-8022-14	QA Split	Radium-226	4.43	0.48		0.354				
101207SOMS3-47-1-C(5)	196017013	TRIPPLICATE	Radium-226	2.68	0.347		0.183	C03		6.1	0.15
101207SOMS3-47-2-C(5)	196017014	TRIPPLICATE	Radium-226	2.72	0.339		0.145	C03		4.7	0.12
101207SOMS3-47-3-C(5)	196017015	TRIPPLICATE	Radium-226	3.02	0.397		0.188	C03		5.8	0.14
101207SOMS3-47-4-C(5)	MWW07-8022-15	QA Split	Radium-226	2.85	0.435		0.467				
101007SOMB-B-3-1-C(5)	196017016	TRIPPLICATE	Radium-226	0.943	0.196		0.121	C03		33	0.50
101007SOMB-B-3-2-C(5)	196017017	TRIPPLICATE	Radium-226	1.11	0.245		0.194	C03		17	0.26
101007SOMB-B-3-3-C(5)	196017018	TRIPPLICATE	Radium-226	1.37	0.199		0.121	C03		3.7	0.07
101007SOMB-B-3-4-C(5)	MWW07-8022-16	QA Split	Radium-226	1.32	0.324		0.399				
101007SOMD-2-1-C(5)	196017019	TRIPPLICATE	Radium-226	1.04	0.187		0.124	C03		6.7	0.09
101007SOMD-2-2-C(5)	196017020	TRIPPLICATE	Radium-226	1.15	0.173		0.0855	C03		17	0.26
101007SOMD-2-3-C(5)	196017021	TRIPPLICATE	Radium-226	1.15	0.197		0.123	C03		17	0.25
101007SOMD-2-4-C(5)	MWW07-8022-07	QA Split	Radium-226	0.973	0.299		0.392				
101107SOMS2-11-1-C(5)	196017022	TRIPPLICATE	Radium-226	1.62	0.230		0.114	C03		3.6	0.06
101107SOMS2-11-2-C(5)	196017023	TRIPPLICATE	Radium-226	1.65	0.226		0.119	C03		1.8	0.03
101107SOMS2-11-3-C(5)	196017024	TRIPPLICATE	Radium-226	1.76	0.238		0.127	C03		4.7	0.07
101107SOMS2-11-4-C(5)	MWW07-8022-08	QA Split	Radium-226	1.68	0.483		0.665				
101107SOMS4-16-1-C(5)	196017025	TRIPPLICATE	Radium-226	1.37	0.228		0.131	C03		52	0.78
101107SOMS4-16-2-C(5)	196017026	TRIPPLICATE	Radium-226	2.51	0.323		0.124	C03		103	1.99
101107SOMS4-16-3-C(5)	196017027	TRIPPLICATE	Radium-226	1.97	0.247		0.136	C03		84	1.55
101107SOMS4-16-4-C(5)	MWW07-8022-09	QA Split	Radium-226	0.804	0.283		0.385				

TABLE 1
SUMMARY OF TRIPPLICATE AND QA SPLIT SAMPLE RESULTS FOR RADIOLOGICAL PARAMETERS
2ND 5-YEAR CERCLA REVIEW_SOIL 2007
MONSANTO
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Sample Identification	Laboratory Identification	Sample Type	Chemical Parameter	Laboratory Result (pCi/g)				Validation Result ^a		Precision ^b	
				Result	Uncertainty	Qualifier	MDC	Qual	ReasonCode	RPD (<35)	DER (≤ 1.42)
100907SOMS-15-1-C(5)	196017028	TRIPPLICATE	Radium-226	6.40	0.673		0.202	C03		15	0.52
100907SOMS-15-2-C(5)	196017029	TRIPPLICATE	Radium-226	6.06	0.597		0.161	C03		9.3	0.34
100907SOMS-15-3-C(5)	196017030	TRIPPLICATE	Radium-226	6.54	0.674		0.208	C03		17	0.60
100907SOMS-15-4-C(5)	MWW07-8022-10	QA Split	Radium-226	5.52	0.51		0.283				
100907SOMS2-06-1-C(5)	196017031	TRIPPLICATE	Radium-226	1.14	0.200		0.114	C03		25	0.38
100907SOMS2-06-2-C(5)	196017032	TRIPPLICATE	Radium-226	1.03	0.200		0.146	C03		35	0.51
100907SOMS2-06-3-C(5)	196017033	TRIPPLICATE	Radium-226	1.21	0.200		0.139	C03		19	0.30
100907SOMS2-06-4-C(5)	MWW07-8022-05	QA Split	Radium-226	1.47	0.387		0.512				
100907SOMS3-99-1-C(5)	196017034	TRIPPLICATE	Radium-226	0.945	0.241		0.144	C03		4.1	0.05
100907SOMS3-99-2-C(5)	196017035	TRIPPLICATE	Radium-226	0.630	0.171		0.148	C03		36	0.43
100907SOMS3-99-3-C(5)	196017036	TRIPPLICATE	Radium-226	1.16	0.213		0.157	C03		24	0.37
100907SOMS3-99-4-C(5)	MWW07-8022-06	QA Split	Radium-226	0.907	0.269		0.331				
101307SOMS3-79-1-C(5)	196017037	TRIPPLICATE	Radium-226	2.27	0.291		0.126	C03		3.5	0.08
101307SOMS3-79-2-C(5)	196017038	TRIPPLICATE	Radium-226	2.05	0.276		0.139	C03		14	0.31
101307SOMS3-79-3-C(5)	196017039	TRIPPLICATE	Radium-226	1.67	0.248		0.144	C03		34	0.72
101307SOMS3-79-4-C(5)	MWW07-8022-01	QA Split	Radium-226	2.35	0.404		0.473				
101307SOMS3-12-1-C(5)	196017040	TRIPPLICATE	Radium-226	1.18	0.191		0.108	C03		18	0.33
101307SOMS3-12-2-C(5)	196017041	TRIPPLICATE	Radium-226	1.19	0.178		0.126	C03		18	0.32
101307SOMS3-12-3-C(5)	196017042	TRIPPLICATE	Radium-226	1.37	0.207		0.111	C03		3.6	0.07
101307SOMS3-12-4-C(5)	MWW07-8022-02	QA Split	Radium-226	1.42	0.315		0.364				
101307SOMS3-112-1-C(5)	196017043	TRIPPLICATE	Radium-226	1.30	0.235		0.158	C03		33	0.49
101307SOMS3-112-2-C(5)	196017044	TRIPPLICATE	Radium-226	1.21	0.227		0.118	C03		26	0.37
101307SOMS3-112-3-C(5)	196017045	TRIPPLICATE	Radium-226	1.21	0.195		0.133	C03		26	0.39
101307SOMS3-112-4-C(5)	MWW07-8022-03	QA Split	Radium-226	0.929	0.301		0.411				
101207SOMS2-35-1-C(5)	196017046	TRIPPLICATE	Radium-226	1.41	0.237		0.123	C03		26	0.39
101207SOMS2-35-2-C(5)	196017047	TRIPPLICATE	Radium-226	1.29	0.225		0.162	C03		17	0.25
101207SOMS2-35-3-C(5)	196017048	TRIPPLICATE	Radium-226	1.36	0.203		0.124	C03		22	0.35
101207SOMS2-35-4-C(5)	MWW07-8022-17	QA Split	Radium-226	1.09	0.334		0.463				
101307SOMS3-09-1-C(5)	196017049	TRIPPLICATE	Radium-226	4.85	0.526		0.151	C03		30	1.12
101307SOMS3-09-2-C(5)	196017050	TRIPPLICATE	Radium-226	5.87	0.616		0.145	C03		11	0.41
101307SOMS3-09-3-C(5)	196017051	TRIPPLICATE	Radium-226	6.07	0.571		0.135	C03		7.6	0.30
101307SOMS3-09-4-C(5)	MWW07-8022-04	QA Split	Radium-226	6.55	0.551		0.331				

^a The triplicate sample data were validated, but not the quality assurance (QA) split samples. The QA Split laboratory report did not contain sufficient back-up data to perform validation. Reason codes are defined in the individual validation reports.

TABLE 1

**SUMMARY OF TRIPPLICATE AND QA SPLIT SAMPLE RESULTS FOR RADIOLOGICAL PARAMETERS
2ND 5-YEAR CERCLA REVIEW_SOIL 2007
MONSANTO
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Sample Identification	Laboratory Identification	Sample Type	Chemical Parameter	Laboratory Result (pCi/g)			Validation Result ^a		Precision ^b	
				Result	Uncertainty	Qualifier	MDC	Qual	ReasonCode	RPD (<35)

^b The relative percent difference (RPD) and duplicate error ratio (DER) were calculated for each triplicate sample result against the associated QA Split sample result when both results were reported as detections (that is, not non-detected). An RPD or DER value that is bolded and boxed is above the acceptance criterion. The RDP and DER acceptance criteria are 35 and 1.42, respectively.

J - result is estimated because of one or more quality control results that are outside the acceptance limits

MDC - minimum detectable concentration

pCi/g - pico-Curies per gram

UJ - result is considered not detected at the laboratory-reported concentration. The non-detected value is considered estimated.

$$\text{RPD} = \frac{|(\text{Triplicate} - \text{QA Split})|}{(\text{Triplicate} + \text{QA Split})/2}$$

$$\text{DER} = \frac{|(\text{Triplicate} - \text{QA Split})|}{2 * (\text{Uncert}_{\text{Triplicate}}^2 + \text{Uncert}_{\text{QA Split}}^2)^{1/2}}$$

MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 195900

Analytical Batches: 695965 and 695967

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method).

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	101307SOMS-07-0-C(5)	10/13/2007	195900001
2	101307SOMS3-19-0-C(5)	10/13/2007	195900002
3	101307SOMS3-21-0-C(5)	10/13/2007	195900003
4	101307SOMS2-29-0-C(5)	10/13/2007	195900004
5	101307SOMS-14-0-C(5)	10/13/2007	195900005
6	101307SOMS2-24-0-C(5)	10/13/2007	195900006
7	101307SOMS3-23-0-C(5)	10/13/2007	195900007
8	101307SOMS3-61-0-C(5)	10/13/2007	195900010
9	101307SOMS3-22-0-C(5)	10/13/2007	195900011
10	101307SOMS3-114-0-C(5)	10/13/2007	195900012
11	101307SOMS3-101-0-C(5)	10/13/2007	195900013
12	101307SOMS3-71-0-C(5)	10/13/2007	195900014
13	101307SOMS-100-0-C(5)	10/13/2007	195900016
14	101307SOMS3-25-0-C(5)	10/13/2007	195900017
15	101307SOMS3-26-0-C(5)	10/13/2007	195900018
16	101307SOMS3-88-0-C(5)	10/13/2007	195900019
17	101307SOMS3-118-0-C(5)	10/13/2007	195900020
18	101507SOMSKMBACK-6-0-C(5)	10/15/2007	195900022
19	101207SOMS3-39-0-C(5)	10/12/2007	195900023
20	101507SOMSKMBACK-7-0-C(5)	10/15/2007	195900024
21	101307SOMS2-12-0-C(5)	10/13/2007	195900025
22	101307SOMS2-7-0-C(5)	10/13/2007	195900026
23	101307SOMS3-06-0-C(5)	10/13/2007	195900027
24	101307SOMS3-53-0-C(5)	10/13/2007	195900028
25	101307SOMS3-08-0-C(5)	10/13/2007	195900030

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

Signatures on chain(s) and all samples accounted for
 ²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 25 soil samples were collected between October 12 and 15, 2007 in HDPE containers. All samples that were collected during this week were shipped in 11 coolers, and arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact. The 25 primary samples were prepared on October 23, 2007, and analyzed between November 1 and 5, 2007, 15 to 19 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples
 Confirm matrix used in geometry standard
 Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
 Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- ____ Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+/- limits
- ____ Resolution demonstration of relevant peak(s)
- ____ Listing of X/Y coordinates in constructing the control charts
- ____ Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- ____ Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
- Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results that were either less than two times the uncertainty were reported by the laboratory as not detected (U), or were greater than two times the uncertainty and greater than the minimum detectable concentration (MDC), with the following exception:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result Minus 2*Uncert	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101307SOMS3-53-0-C(5)	195900028	²²⁸ Ra	-0.094	0.704	UJ	Q09

Result was flagged as not detected (UJ) at the reported concentration because it failed both the above “two times uncertainty” criterion and the blank criterion specified in Section V below.

Additionally, the laboratory qualified the following samples as footnoted:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101307SOMS-14-0-C(5)	195900005	²²⁸ Ra	0.530 UI ^a	UJ	Q02
101307SOMS3-23-0-C(5)	195900007	²²⁸ Ra	0.498 UI ^a	UJ	Q02
101307SOMS-100-0-C(5)	195900016	²²⁸ Ra	0.187 UI ^b	R	P03

^a Data rejected due to low abundance.

^b Data rejected due to high peak-width.

“Data rejected due to low abundance” is interpreted to be that there was positive interference at the target frequency that did not meet the qualitative criteria for the target isotope, so the observed result is treated as not detected (UJ). “Data rejected due to high peak-width” is interpreted to be a loss of resolution for the detected peak, so is considered rejected (R).

V. Blanks

- Method blank results < MDC

- Calculate normalized absolute difference (NAD) =

$$|(\text{Sample} - \text{Blank})| / (\sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2]})$$
- If normalized absolute difference is > 2.58, no action necessary
- If normalized absolute difference is between 1.96 and 2.58, qualify sample J
- If normalized absolute difference is less than 1.96, consider rejecting data

All normalized absolute differences (per above calculation) were greater than 2.58 for all sample results that were reportable (that is, reported as a detection above the MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101307SOMS3-21-0-C(5)	195900003	^{137}Cs	2.14	0.129	J	B01
101307SOMS3-71-0-C(5)	195900014	^{137}Cs	2.36	0.177	J	B01
101307SOMS3-25-0-C(5)	195900017	^{137}Cs	2.35	0.227	J	B01
101307SOMS3-26-0-C(5)	195900018	^{137}Cs	2.25	0.145	J	B01
101307SOMS3-88-0-C(5)	195900019	^{228}Ra	2.01	0.928	J	B01
101507SOMKBACK-6-0-C(5)	195900022	^{137}Cs	2.42	0.147	J	B01
101307SOMS3-53-0-C(5)	195900028	^{228}Ra	1.73	0.704	UJ	B01

VI. Laboratory Duplicates

- Must be analyzed for each batch or for every 20 samples
- RPDs within the laboratory's control limits (RPD not calculated when one or both duplicate results are not detected)
- Calculate the duplicate error ratio (DER) =

$$|(\text{Sample} - \text{Duplicate})| / (2 * \sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2]})$$

$$\text{DER} \leq 1.42$$

- If DER > 1.42, qualify sample J

The laboratory's laboratory duplicate criteria are: If duplicate activities are less than 5 times MDC, then the RPD should be less than 100%; if activities are greater than 5 times the MDC, the RPD should be less than 20%.

All RPDs and DERs associated with both laboratory duplicate pairs were within these criteria.

VII. Laboratory Control Samples

- Must be analyzed for each batch or for every 20 samples
- Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Equipment and Water Blank Samples

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ^{226}Ra and ^{137}Cs (see data validation report for GEL SDG 195907). All equipment blanks and water blanks were not detected for both ^{226}Ra and ^{137}Cs .

IX. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
101307SOMS-14-0-C(5)	195900005	^{228}Ra	0.530 UI	UJ	Q02
101307SOMS3-23-0-C(5)	195900007	^{228}Ra	0.498 UI	UJ	Q02
101307SOMS-100-0-C(5)	195900016	^{228}Ra	0.187 UI	R	P03
101307SOMS3-21-0-C(5)	195900003	^{137}Cs	0.129	J	B01
101307SOMS3-71-0-C(5)	195900014	^{137}Cs	0.177	J	B01
101307SOMS3-25-0-C(5)	195900017	^{137}Cs	0.227	J	B01
101307SOMS3-26-0-C(5)	195900018	^{137}Cs	0.145	J	B01
101307SOMS3-88-0-C(5)	195900019	^{228}Ra	0.928	J	B01
101507SOMKBACK-6-0-C(5)	195900022	^{137}Cs	0.147	J	B01
101307SOMS3-53-0-C(5)	195900028	^{228}Ra	0.704	UJ	Q09,B01

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency
L04	LCS not the same matrix as the analytical samples

Reason Code	Definition
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDC	Data Validation					
									Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101307SOMS-07-0-C(5)	195900001	1201446555	SAMPLE	Cesium-137	0.312	0.069		0.0703	0.242	0.174	4.39	0.09		C03
101307SOMS-07-0-C(5)	195900001	1201446555	SAMPLE	Radium-226	1.79	0.240		0.121	1.669	1.310	7.18	0.16		C03
101307SOMS-07-0-C(5)	195900001	1201446555	SAMPLE	Radium-228	1.09	0.301		0.223	0.867	0.488	3.50	0.18		C03
101307SOMS3-19-0-C(5)	195900002	1201446555	SAMPLE	Cesium-137	0.385	0.0904		0.0662	0.319	0.204	4.18			C03
101307SOMS3-19-0-C(5)	195900002	1201446555	SAMPLE	Radium-226	4.60	0.502		0.146	4.454	3.596	9.06			C03
101307SOMS3-19-0-C(5)	195900002	1201446555	SAMPLE	Radium-228	1.08	0.372		0.260	0.820	0.336	2.82			C03
101307SOMS3-21-0-C(5)	195900003	1201446555	SAMPLE	Cesium-137	0.129	0.0573		0.0723	0.057	0.014	2.14		J	B01,C03
101307SOMS3-21-0-C(5)	195900003	1201446555	SAMPLE	Radium-226	1.27	0.201		0.125	1.145	0.868	5.99			C03
101307SOMS3-21-0-C(5)	195900003	1201446555	SAMPLE	Radium-228	1.64	0.344		0.233	1.407	0.952	4.65			C03
101307SOMS2-29-0-C(5)	195900004	1201446555	SAMPLE	Cesium-137	0.602	0.106		0.0799	0.522	0.390	5.60			C03
101307SOMS2-29-0-C(5)	195900004	1201446555	SAMPLE	Radium-226	1.98	0.276		0.133	1.847	1.428	6.96			C03
101307SOMS2-29-0-C(5)	195900004	1201446555	SAMPLE	Radium-228	1.31	0.365		0.262	1.048	0.580	3.50			C03
101307SOMS-14-0-C(5)	195900005	1201446555	SAMPLE	Cesium-137	0.314	0.0822		0.0844	0.230	0.150	3.73			C03
101307SOMS-14-0-C(5)	195900005	1201446555	SAMPLE	Radium-226	8.82	0.873		0.174	8.646	7.074	10.05			C03
101307SOMS-14-0-C(5)	195900005	1201446555	SAMPLE	Radium-228	0.00	0.372	UI	0.530	-0.530	-0.744	0.04		UJ	Q02,C03
101307SOMS2-24-0-C(5)	195900006	1201446555	SAMPLE	Cesium-137	0.191	0.0586		0.067	0.124	0.074	3.12			C03
101307SOMS2-24-0-C(5)	195900006	1201446555	SAMPLE	Radium-226	1.95	0.261		0.128	1.822	1.428	7.23			C03
101307SOMS2-24-0-C(5)	195900006	1201446555	SAMPLE	Radium-228	1.38	0.304		0.203	1.177	0.772	4.40			C03
101307SOMS3-23-0-C(5)	195900007	1201446555	SAMPLE	Cesium-137	0.248	0.0642		0.058	0.190	0.120	3.73			C03
101307SOMS3-23-0-C(5)	195900007	1201446555	SAMPLE	Radium-226	1.15	0.237		0.128	1.022	0.676	4.63			C03
101307SOMS3-23-0-C(5)	195900007	1201446555	SAMPLE	Radium-228	0.00	0.326	UI	0.498	-0.498	-0.652	0.05		UJ	Q02,C03
101307SOMS3-61-0-C(5)	195900010	1201446555	SAMPLE	Cesium-137	0.243	0.0844		0.0761	0.167	0.074	2.81			C03
101307SOMS3-61-0-C(5)	195900010	1201446555	SAMPLE	Radium-226	1.48	0.205		0.124	1.356	1.070	6.87			C03
101307SOMS3-61-0-C(5)	195900010	1201446555	SAMPLE	Radium-228	1.35	0.334		0.225	1.125	0.682	3.93			C03
101307SOMS3-22-0-C(5)	195900011	1201446555	SAMPLE	Cesium-137	0.208	0.0668		0.0724	0.136	0.074	3.01			C03
101307SOMS3-22-0-C(5)	195900011	1201446555	SAMPLE	Radium-226	1.30	0.221		0.125	1.175	0.858	5.61			C03
101307SOMS3-22-0-C(5)	195900011	1201446555	SAMPLE	Radium-228	1.23	0.342		0.228	1.002	0.546	3.50			C03
101307SOMS3-114-0-C(5)	195900012	1201446555	SAMPLE	Cesium-137	0.278	0.0975		0.0621	0.216	0.083	2.80			C03
101307SOMS3-114-0-C(5)	195900012	1201446555	SAMPLE	Radium-226	2.27	0.298		0.143	2.127	1.674	7.42			C03
101307SOMS3-114-0-C(5)	195900012	1201446555	SAMPLE	Radium-228	1.19	0.375		0.221	0.969	0.440	3.09			C03
101307SOMS3-101-0-C(5)	195900013	1201446555	SAMPLE	Cesium-137	4.90	0.358		0.0883	4.812	4.184	13.67			C03
101307SOMS3-101-0-C(5)	195900013	1201446555	SAMPLE	Radium-226	3.13	0.354		0.140	2.990	2.422	8.67			C03
101307SOMS3-101-0-C(5)	195900013	1201446555	SAMPLE	Radium-228	0.282	0.216	U	0.322	-0.040	-0.150	1.19			C03
101307SOMS3-71-0-C(5)	195900014	1201446555	SAMPLE	Cesium-137	0.177	0.0727		0.059	0.118	0.032	2.36		J	B01,C03
101307SOMS3-71-0-C(5)	195900014	1201446555	SAMPLE	Radium-226	2.16	0.270		0.117	2.043	1.620	7.76			C03
101307SOMS3-71-0-C(5)	195900014	1201446555	SAMPLE	Radium-228	1.16	0.310		0.227	0.933	0.540	3.62			C03
101307SOMS-100-0-C(5)	195900016	1201446555	SAMPLE	Cesium-137	2.12	0.191		0.0471	2.073	1.738	11.05			C03
101307SOMS-100-0-C(5)	195900016	1201446555	SAMPLE	Radium-226	2.43	0.286		0.106	2.324	1.858	8.27			C03
101307SOMS-100-0-C(5)	195900016	1201446555	SAMPLE	Radium-228	0.00	0.309	UI	0.187	-0.187	-0.618	0.05		R	P03,C03
101307SOMS3-25-0-C(5)	195900017	1201446555	SAMPLE	Cesium-137	0.227	0.0944		0.0831	0.144	0.038	2.35		J	B01,C03
101307SOMS3-25-0-C(5)	195900017	1201446555	SAMPLE	Radium-226	1.54	0.227		0.149	1.391	1.086	6.50			C03
101307SOMS3-25-0-C(5)	195900017	1201446555	SAMPLE	Radium-228	1.31	0.350		0.260	1.050	0.610	3.64			C03
101307SOMS3-26-0-C(5)	195900018	1201446555	SAMPLE	Cesium-137	0.145	0.0617		0.0813	0.064	0.022	2.25		J	B01,C03
101307SOMS3-26-0-C(5)	195900018	1201446555	SAMPLE	Radium-226	1.19	0.219		0.134	1.056	0.752	5.17			C03

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Sample_No	Lab_Id	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDC	Data Validation					
									Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101307SOMS3-26-0-C(5)	195900018	1201446555	SAMPLE	Radium-228	1.08	0.370		0.291	0.789	0.340	2.84			C03
101307SOMS3-88-0-C(5)	195900019	1201446555	SAMPLE	Cesium-137	0.0433	0.095	U	0.146	-0.103	-0.147	0.43			C03
101307SOMS3-88-0-C(5)	195900019	1201446555	SAMPLE	Radium-226	13.9	1.36		0.218	13.682	11.180	10.19			C03
101307SOMS3-88-0-C(5)	195900019	1201446555	SAMPLE	Radium-228	0.928	0.451		0.507	0.421	0.026	2.01	J	B01,C03	
101307SOMS3-118-0-C(5)	195900020	1201446555	SAMPLE	Cesium-137	0.342	0.111		0.079	0.263	0.120	3.04			C03
101307SOMS3-118-0-C(5)	195900020	1201446555	SAMPLE	Radium-226	2.10	0.276		0.150	1.950	1.548	7.38			C03
101307SOMS3-118-0-C(5)	195900020	1201446555	SAMPLE	Radium-228	1.27	0.315		0.293	0.977	0.640	3.91			C03
101507SOMKMBACK-6-0-C(5)	195900022	1201446555	SAMPLE	Cesium-137	0.147	0.058		0.0627	0.084	0.031	2.42	J	B01,C03	
101507SOMKMBACK-6-0-C(5)	195900022	1201446555	SAMPLE	Radium-226	0.919	0.190		0.122	0.797	0.539	4.53			C03
101507SOMKMBACK-6-0-C(5)	195900022	1201446555	SAMPLE	Radium-228	1.29	0.329		0.236	1.054	0.632	3.81			C03
101207SOMS3-39-0-C(5)	195900023	1201446555	SAMPLE	Cesium-137	0.244	0.0701		0.0864	0.158	0.104	3.37			C03
101207SOMS3-39-0-C(5)	195900023	1201446555	SAMPLE	Radium-226	1.14	0.192		0.129	1.011	0.756	5.60			C03
101207SOMS3-39-0-C(5)	195900023	1201446555	SAMPLE	Radium-228	1.30	0.349		0.271	1.029	0.602	3.63			C03
101507SOMKMBACK-7-0-C(5)	195900024	1201446555	SAMPLE	Cesium-137	0.320	0.072		0.0624	0.258	0.176	4.32			C03
101507SOMKMBACK-7-0-C(5)	195900024	1201446555	SAMPLE	Radium-226	1.02	0.172		0.0977	0.922	0.676	5.53			C03
101507SOMKMBACK-7-0-C(5)	195900024	1201446555	SAMPLE	Radium-228	1.21	0.290		0.209	1.001	0.630	4.03			C03
101307SOMS2-12-0-C(5)	195900025	1201446572	SAMPLE	Cesium-137	0.559	0.0973		0.0734	0.486	0.364	5.40			C03
101307SOMS2-12-0-C(5)	195900025	1201446572	SAMPLE	Radium-226	1.90	0.277		0.157	1.743	1.346	6.73			C03
101307SOMS2-12-0-C(5)	195900025	1201446572	SAMPLE	Radium-228	1.39	0.369		0.269	1.121	0.652	3.69			C03
101307SOMS2-7-0-C(5)	195900026	1201446572	SAMPLE	Cesium-137	0.272	0.079		0.083	0.189	0.114	3.10			C03
101307SOMS2-7-0-C(5)	195900026	1201446572	SAMPLE	Radium-226	2.56	0.329		0.148	2.412	1.902	7.68			C03
101307SOMS2-7-0-C(5)	195900026	1201446572	SAMPLE	Radium-228	1.17	0.337		0.319	0.851	0.496	3.39			C03
101307SOMS3-06-0-C(5)	195900027	1201446572	SAMPLE	Cesium-137	0.317	0.0534		0.0437	0.273	0.210	5.02			C03
101307SOMS3-06-0-C(5)	195900027	1201446572	SAMPLE	Radium-226	2.42	0.269		0.0918	2.328	1.882	8.84			C03
101307SOMS3-06-0-C(5)	195900027	1201446572	SAMPLE	Radium-228	1.24	0.267		0.178	1.062	0.706	4.47			C03
101307SOMS3-53-0-C(5)	195900028	1201446572	SAMPLE	Cesium-137	0.448	0.0952		0.0932	0.355	0.258	4.39			C03
101307SOMS3-53-0-C(5)	195900028	1201446572	SAMPLE	Radium-226	1.95	0.272		0.143	1.807	1.406	7.04			C03
101307SOMS3-53-0-C(5)	195900028	1201446572	SAMPLE	Radium-228	0.704	0.399		0.249	0.455	-0.094	1.73	UJ	Q09,B01,C03	
101307SOMS3-08-0-C(5)	195900030	1201446572	SAMPLE	Cesium-137	0.334	0.0779		0.0875	0.247	0.178	3.89			C03
101307SOMS3-08-0-C(5)	195900030	1201446572	SAMPLE	Radium-226	2.65	0.297		0.133	2.517	2.056	8.79			C03
101307SOMS3-08-0-C(5)	195900030	1201446572	SAMPLE	Radium-228	1.16	0.331		0.234	0.926	0.498	3.42			C03
MB	1201446555	1201446555	MB	Cesium-137	0.00177	0.0155	U	0.0267						
MB	1201446555	1201446555	MB	Radium-226	0.0279	0.0509	U	0.070						
MB	1201446555	1201446555	MB	Radium-228	0.0153	0.0614	U	0.100						
101307SOMS-07-0-C(5)	1201446556	1201446555	DUP	Cesium-137	0.293	0.0812		0.0798						
101307SOMS-07-0-C(5)	1201446556	1201446555	DUP	Radium-226	1.91	0.277		0.140						
101307SOMS-07-0-C(5)	1201446556	1201446555	DUP	Radium-228	1.26	0.354		0.280						
MB	1201446572	1201446572	MB	Cesium-137	0.0101	0.0297	U	0.029						
MB	1201446572	1201446572	MB	Radium-226	0.0152	0.0403	U	0.0733						
MB	1201446572	1201446572	MB	Radium-228	-0.000673	0.0763	U	0.126						
101207SOMS2-26-0-C(5)	1201446573	1201446572	DUP	Cesium-137	1.12	0.142		0.0851						
101207SOMS2-26-0-C(5)	1201446573	1201446572	DUP	Radium-226	1.98	0.259		0.142						
101207SOMS2-26-0-C(5)	1201446573	1201446572	DUP	Radium-228	1.49	0.348		0.235						

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDC	Data Validation					
									Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101207SOMS2-26-0-C(5)	195902001	1201446572	SAMPLE	Cesium-137	1.24	0.164		0.0794					0.28	
101207SOMS2-26-0-C(5)	195902001	1201446572	SAMPLE	Radium-226	1.86	0.260		0.145					0.16	
101207SOMS2-26-0-C(5)	195902001	1201446572	SAMPLE	Radium-228	0.973	0.362		0.281					0.51	

MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 195902

Analytical Batches: 695967 and 695969

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method)

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	101207SOMS2-26-0-C(5)	10/12/07	195902001
2	101207SOMS3-46-0-C(5)	10/12/07	195902003
3	101207SOMS3-32-0-C(5)	10/12/07	195902005
4	101207SOMS3-93-0-C(5)	10/12/07	195902006
5	101207SOMS3-90-0-C(5)	10/12/07	195902007
6	101207SOMS3-49-0-C(5)	10/12/07	195902008
7	101207SOMS3-48-0-C(5)	10/12/07	195902009
8	101207SOMS3-41-0-C(5)	10/12/07	195902010
9	101207SOMS3-34-0-C(5)	10/12/07	195902011
10	101207SOMS2-34-0-C(5)	10/12/07	195902012
11	101207SOMSC-2-0-C(5)	10/12/07	195902013
12	101207SOMS3-17-0-C(5)	10/12/07	195902014
13	101207SOMS3-98-0-C(5)	10/12/07	195902015
14	101207SOMS2-25-0-C(5)	10/12/07	195902016
15	101207SOML1-05-0-C(5)	10/12/07	195902017
16	101207SOMS3-44-0-C(5)	10/12/07	195902018
17	101207SOMS3-43-0-C(5)	10/12/07	195902019
18	101207SOMS3-42-0-C(5)	10/12/07	195902020
19	101007SOMB-2-0-C(5)	10/10/07	195902021
20	101007SOMS3-81-0-C(5)	10/10/07	195902022
21	101007SOMS3-80-0-C(5)	10/10/07	195902023
22	101007SOMB-1-0-C(5)	10/10/07	195902024
23	101007SOMS2-17-0-C(5)	10/10/07	195902025
24	101007SOMS3-115-0-C(5)	10/10/07	195902026
25	101007SOMS2-02-0-C(5)	10/10/07	195902027
26	101007SOMS3-105-0-C(5)	10/10/07	195902028
27	101007SOMC-1-0-C(5)	10/10/07	195902030

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

Signatures on chain(s) and all samples accounted for

²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 27 sediment samples were collected on October 10 and 12, 2007 in HDPE containers. All samples collected during this week were shipped in 11 coolers, and arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact. The 27 primary samples were analyzed on November 2 and 6, 2007, 23 to 25 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples

Confirm matrix used in geometry standard

Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate

Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+/- limits
- Resolution demonstration of relevant peak(s)
- Listing of X/Y coordinates in constructing the control charts
- Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
- Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results that were either less than two times the uncertainty were reported by the laboratory as not detected (U), or were greater than two times the uncertainty and greater than the minimum detectable concentration (MDC), with the following exception:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result Minus 2*Uncert	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101007SOMS3-81-0-C(5)	195902022	^{228}Ra	-0.027	0.371	J	Q09

Additionally, the laboratory qualified the following sample as footnoted:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101207SOMS3-34-0-C(5)	195902011	^{137}Cs	0.00 UI ^a	0.00 U	Q02

^a Data rejected due to no valid peak.

“Data rejected due to no valid peak” is interpreted to be that there was positive interference at the target frequency that did not meet the qualitative criteria for the target isotope, so the observed result is treated as not detected (UJ).

V. Blanks

- Method blank results < MDC
- Calculate normalized absolute difference (NAD) = $|(\text{Sample} - \text{Blank})| / (\text{[Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2])^{1/2}$
- If normalized absolute difference is > 2.58, no action necessary
- If normalized absolute difference is between 1.96 and 2.58, qualify sample J
- If normalized absolute difference is less than 1.96, consider rejecting data

All normalized absolute differences (per above calculation) were greater than 2.58 for all sample results that were reportable (that is, reported as a detection above the MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101207SOMS3-90-0-C(5)	195902007	¹³⁷ Cs	2.51	0.233	J	B01
101207SOMS3-49-0-C(5)	195902008	²²⁸ Ra	2.41	0.882	J	B01
101207SOMS3-41-0-C(5)	195902010	¹³⁷ Cs	2.04	0.0945	J	B01
101207SOMSC-2-0-C(5)	195902013	²²⁸ Ra	2.57	1.20	J	B01
101207SOMS3-17-0-C(5)	195902014	¹³⁷ Cs	1.90	0.139	J	B01
101007SOMB-2-0-C(5)	195902021	²²⁸ Ra	2.39	0.900	J	B01
101007SOMS3-81-0-C(5)	195902022	²²⁸ Ra	2.00	0.371	J	B01

VI. Laboratory Duplicates

Must be analyzed for each batch or for every 20 samples

RPDs within the laboratory's control limits

Calculate the duplicate error ratio (DER) =

$$|(\text{Sample} - \text{Duplicate})| / (2 * (\text{[Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2])^{1/2})$$

$$\text{DER} \leq 1.42$$

If DER > 1.42, qualify sample J

The laboratory's laboratory duplicate criteria are: If duplicate activities are less than 5 times MDC, then the RPD should be less than 100%; if activities are greater than 5 times the MDC, the RPD should be less than 20%.

With the following exception, all RPDs and DERs associated with both laboratory duplicate pairs were within these criteria:

Field Sample Identification	Laboratory Sample Identification	Parameter	RPD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
100907SOMS3-67-0-C(5)	195905001	¹³⁷ Cs	26	1.04	None	None

Although the RPD of 26 for this duplicate pair was greater than the control limit of 20, the DER of 0.61 was within control. The variance does not constitute a significant difference, so neither the primary sample results nor associated samples results were qualified.

VII. Laboratory Control Samples

Must be analyzed for each batch or for every 20 samples

Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Equipment and Water Blank Samples

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ²²⁶Ra and ¹³⁷Cs (see data validation report for GEL SDG 195907). All equipment blanks and water blanks were not detected for both ²²⁶Ra and ¹³⁷Cs.

IX. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
101207SOMS3-34-0-C(5)	195902011	¹³⁷ Cs	0.00 UI	UJ	Q02
101207SOMS3-90-0-C(5)	195902007	¹³⁷ Cs	0.233	J	B01
101207SOMS3-49-0-C(5)	195902008	²²⁸ Ra	0.882	J	B01
101207SOMS3-41-0-C(5)	195902010	¹³⁷ Cs	0.0945	J	B01
101207SOMSC-2-0-C(5)	195902013	²²⁸ Ra	1.20	J	B01
101207SOMS3-17-0-C(5)	195902014	¹³⁷ Cs	0.139	J	B01
101007SOMB-2-0-C(5)	195902021	²²⁸ Ra	0.900	J	B01
101007SOMS3-81-0-C(5)	195902022	²²⁸ Ra	0.371	J	Q09,B01

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency
L04	LCS not the same matrix as the analytical samples

Reason Code	Definition
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDC	Data Validation				
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual
101207SOMS2-26-0-C(5)	195902001	695967	1201446572	SAMPLE	Cesium-137	1.24	0.164		0.0794	1.161	0.912	7.38	0.28	C03
101207SOMS2-26-0-C(5)	195902001	695967	1201446572	SAMPLE	Radium-226	1.86	0.260		0.145	1.715	1.340	7.01	0.16	C03
101207SOMS2-26-0-C(5)	195902001	695967	1201446572	SAMPLE	Radium-228	0.973	0.362		0.281	0.692	0.249	2.63	0.51	C03
101207SOMS3-46-0-C(5)	195902003	695967	1201446572	SAMPLE	Cesium-137	0.349	0.0611		0.0522	0.297	0.227	4.99		C03
101207SOMS3-46-0-C(5)	195902003	695967	1201446572	SAMPLE	Radium-226	2.16	0.263		0.100	2.060	1.634	8.06		C03
101207SOMS3-46-0-C(5)	195902003	695967	1201446572	SAMPLE	Radium-228	1.02	0.269		0.185	0.835	0.482	3.65		C03
101207SOMS3-32-0-C(5)	195902005	695967	1201446572	SAMPLE	Cesium-137	0.0133	0.0306	U	0.0478	-0.035	-0.048	0.08		C03
101207SOMS3-32-0-C(5)	195902005	695967	1201446572	SAMPLE	Radium-226	1.44	0.177		0.0777	1.362	1.086	7.85		C03
101207SOMS3-32-0-C(5)	195902005	695967	1201446572	SAMPLE	Radium-228	0.586	0.193		0.144	0.442	0.200	2.83		C03
101207SOMS3-93-0-C(5)	195902006	695967	1201446572	SAMPLE	Cesium-137	0.351	0.0838		0.0871	0.264	0.183	3.83		C03
101207SOMS3-93-0-C(5)	195902006	695967	1201446572	SAMPLE	Radium-226	1.41	0.212		0.131	1.279	0.986	6.46		C03
101207SOMS3-93-0-C(5)	195902006	695967	1201446572	SAMPLE	Radium-228	1.68	0.368		0.227	1.453	0.944	4.47		C03
101207SOMS3-90-0-C(5)	195902007	695967	1201446572	SAMPLE	Cesium-137	0.233	0.0837		0.0845	0.149	0.066	2.51	J	B01,C03
101207SOMS3-90-0-C(5)	195902007	695967	1201446572	SAMPLE	Radium-226	1.35	0.237		0.129	1.221	0.876	5.55		C03
101207SOMS3-90-0-C(5)	195902007	695967	1201446572	SAMPLE	Radium-228	1.23	0.314		0.281	0.949	0.602	3.81		C03
101207SOMS3-49-0-C(5)	195902008	695967	1201446572	SAMPLE	Cesium-137	0.383	0.107		0.0615	0.322	0.169	3.36		C03
101207SOMS3-49-0-C(5)	195902008	695967	1201446572	SAMPLE	Radium-226	1.26	0.182		0.106	1.154	0.896	6.68		C03
101207SOMS3-49-0-C(5)	195902008	695967	1201446572	SAMPLE	Radium-228	0.882	0.358		0.205	0.677	0.166	2.41	J	B01,C03
101207SOMS3-48-0-C(5)	195902009	695967	1201446572	SAMPLE	Cesium-137	0.470	0.131		0.0928	0.377	0.208	3.42		C03
101207SOMS3-48-0-C(5)	195902009	695967	1201446572	SAMPLE	Radium-226	0.788	0.190		0.145	0.643	0.408	3.98		C03
101207SOMS3-48-0-C(5)	195902009	695967	1201446572	SAMPLE	Radium-228	1.02	0.350		0.321	0.699	0.320	2.85		C03
101207SOMS3-41-0-C(5)	195902010	695967	1201446572	SAMPLE	Cesium-137	0.0945	0.0288		0.0408	0.054	0.037	2.04	J	B01,C03
101207SOMS3-41-0-C(5)	195902010	695967	1201446572	SAMPLE	Radium-226	1.16	0.169		0.0823	1.078	0.822	6.59		C03
101207SOMS3-41-0-C(5)	195902010	695967	1201446572	SAMPLE	Radium-228	1.15	0.238		0.166	0.984	0.674	4.60		C03
101207SOMS3-34-0-C(5)	195902011	695967	1201446572	SAMPLE	Cesium-137	0.00	0.044	UI	0.0486	-0.049	-0.088	0.19	UJ	Q02,C03
101207SOMS3-34-0-C(5)	195902011	695967	1201446572	SAMPLE	Radium-226	0.972	0.157		0.0843	0.888	0.658	5.90		C03
101207SOMS3-34-0-C(5)	195902011	695967	1201446572	SAMPLE	Radium-228	0.952	0.246		0.153	0.799	0.460	3.70		C03
101207SOMS2-34-0-C(5)	195902012	695967	1201446572	SAMPLE	Cesium-137	2.37	0.217		0.0722	2.298	1.936	10.77		C03
101207SOMS2-34-0-C(5)	195902012	695967	1201446572	SAMPLE	Radium-226	1.93	0.248		0.123	1.807	1.434	7.62		C03
101207SOMS2-34-0-C(5)	195902012	695967	1201446572	SAMPLE	Radium-228	1.40	0.329		0.202	1.198	0.742	4.15		C03
101207SOMSC-2-0-C(5)	195902013	695967	1201446572	SAMPLE	Cesium-137	0.311	0.0983		0.0963	0.215	0.114	2.93		C03
101207SOMSC-2-0-C(5)	195902013	695967	1201446572	SAMPLE	Radium-226	0.986	0.242		0.150	0.836	0.502	3.96		C03
101207SOMSC-2-0-C(5)	195902013	695967	1201446572	SAMPLE	Radium-228	1.20	0.460		0.286	0.914	0.280	2.57	J	B01,C03
101207SOMS3-17-0-C(5)	195902014	695967	1201446572	SAMPLE	Cesium-137	0.139	0.0608		0.0711	0.068	0.017	1.90	J	B01,C03
101207SOMS3-17-0-C(5)	195902014	695967	1201446572	SAMPLE	Radium-226	2.35	0.276		0.129	2.221	1.798	8.37		C03
101207SOMS3-17-0-C(5)	195902014	695967	1201446572	SAMPLE	Radium-228	0.982	0.320		0.247	0.735	0.342	2.99		C03
101207SOMS3-98-0-C(5)	195902015	695967	1201446572	SAMPLE	Cesium-137	0.434	0.102		0.090	0.344	0.230	3.99		C03
101207SOMS3-98-0-C(5)	195902015	695967	1201446572	SAMPLE	Radium-226	1.26	0.252		0.168	1.092	0.756	4.88		C03
101207SOMS3-98-0-C(5)	195902015	695967	1201446572	SAMPLE	Radium-228	1.50	0.401		0.264	1.236	0.698	3.68		C03
101207SOMS2-25-0-C(5)	195902016	695967	1201446572	SAMPLE	Cesium-137	0.213	0.053		0.0537	0.159	0.107	3.34		C03
101207SOMS2-25-0-C(5)	195902016	695967	1201446572	SAMPLE	Radium-226	1.33	0.195		0.0954	1.235	0.940	6.60		C03
101207SOMS2-25-0-C(5)	195902016	695967	1201446572	SAMPLE	Radium-228	1.25	0.265		0.203	1.047	0.720	4.54		C03
101207SOML1-05-0-C(5)	195902017	695967	1201446572	SAMPLE	Cesium-137	0.391	0.0801		0.0558	0.335	0.231	4.46		C03
101207SOML1-05-0-C(5)	195902017	695967	1201446572	SAMPLE	Radium-226	1.09	0.171		0.0954	0.995	0.748	6.12		C03
101207SOML1-05-0-C(5)	195902017	695967	1201446572	SAMPLE	Radium-228	1.16	0.270		0.158	1.002	0.620	4.14		C03

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDC	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101207SOMS3-44-0-C(5)	195902018	695969	1201446575	SAMPLE	Cesium-137	0.318	0.0873		0.0785	0.240	0.143	3.49			C03
101207SOMS3-44-0-C(5)	195902018	695969	1201446575	SAMPLE	Radium-226	1.31	0.201		0.133	1.177	0.908	5.61			C03
101207SOMS3-44-0-C(5)	195902018	695969	1201446575	SAMPLE	Radium-228	1.33	0.309		0.266	1.064	0.712	4.34			C03
101207SOMS3-43-0-C(5)	195902019	695969	1201446575	SAMPLE	Cesium-137	0.228	0.0627		0.0601	0.168	0.103	3.37			C03
101207SOMS3-43-0-C(5)	195902019	695969	1201446575	SAMPLE	Radium-226	1.22	0.167		0.106	1.114	0.886	6.00			C03
101207SOMS3-43-0-C(5)	195902019	695969	1201446575	SAMPLE	Radium-228	1.26	0.303		0.182	1.078	0.654	4.19			C03
101207SOMS3-42-0-C(5)	195902020	695969	1201446575	SAMPLE	Cesium-137	0.224	0.0735		0.0509	0.173	0.077	2.88			C03
101207SOMS3-42-0-C(5)	195902020	695969	1201446575	SAMPLE	Radium-226	1.20	0.173		0.0945	1.106	0.854	5.75			C03
101207SOMS3-42-0-C(5)	195902020	695969	1201446575	SAMPLE	Radium-228	1.19	0.268		0.195	0.995	0.654	4.44			C03
101007SOMB-2-0-C(5)	195902021	695969	1201446575	SAMPLE	Cesium-137	0.831	0.135		0.072	0.759	0.561	6.05			C03
101007SOMB-2-0-C(5)	195902021	695969	1201446575	SAMPLE	Radium-226	1.13	0.201		0.131	0.999	0.728	4.81			C03
101007SOMB-2-0-C(5)	195902021	695969	1201446575	SAMPLE	Radium-228	0.900	0.394		0.315	0.585	0.112	2.39	J	B01,C03	
101007SOMS3-81-0-C(5)	195902022	695969	1201446575	SAMPLE	Cesium-137	0.746	0.101		0.0488	0.697	0.544	7.17			C03
101007SOMS3-81-0-C(5)	195902022	695969	1201446575	SAMPLE	Radium-226	0.568	0.142		0.0939	0.474	0.284	2.99			C03
101007SOMS3-81-0-C(5)	195902022	695969	1201446575	SAMPLE	Radium-228	0.371	0.199		0.141	0.230	-0.027	2.00	J	Q09,B01,C03	
101007SOMS3-80-0-C(5)	195902023	695969	1201446575	SAMPLE	Cesium-137	2.19	0.240		0.0724	2.118	1.710	9.07			C03
101007SOMS3-80-0-C(5)	195902023	695969	1201446575	SAMPLE	Radium-226	0.952	0.230		0.149	0.803	0.492	3.60			C03
101007SOMS3-80-0-C(5)	195902023	695969	1201446575	SAMPLE	Radium-228	0.780	0.246		0.280	0.500	0.288	3.23			C03
101007SOMB-1-0-C(5)	195902024	695969	1201446575	SAMPLE	Cesium-137	0.249	0.0647		0.0684	0.181	0.120	3.58			C03
101007SOMB-1-0-C(5)	195902024	695969	1201446575	SAMPLE	Radium-226	0.874	0.187		0.120	0.754	0.500	3.89			C03
101007SOMB-1-0-C(5)	195902024	695969	1201446575	SAMPLE	Radium-228	1.31	0.313		0.254	1.056	0.684	4.22			C03
101007SOMS2-17-0-C(5)	195902025	695969	1201446575	SAMPLE	Cesium-137	0.289	0.0921		0.0603	0.229	0.105	3.02			C03
101007SOMS2-17-0-C(5)	195902025	695969	1201446575	SAMPLE	Radium-226	1.01	0.218		0.123	0.887	0.574	4.01			C03
101007SOMS2-17-0-C(5)	195902025	695969	1201446575	SAMPLE	Radium-228	1.19	0.332		0.227	0.963	0.526	3.65			C03
101007SOMS3-115-0-C(5)	195902026	695969	1201446575	SAMPLE	Cesium-137	0.914	0.125		0.0724	0.842	0.664	7.17			C03
101007SOMS3-115-0-C(5)	195902026	695969	1201446575	SAMPLE	Radium-226	1.02	0.199		0.129	0.891	0.622	4.36			C03
101007SOMS3-115-0-C(5)	195902026	695969	1201446575	SAMPLE	Radium-228	1.12	0.314		0.221	0.899	0.492	3.63			C03
101007SOMS2-02-0-C(5)	195902027	695969	1201446575	SAMPLE	Cesium-137	0.504	0.0932		0.0526	0.451	0.318	5.22			C03
101007SOMS2-02-0-C(5)	195902027	695969	1201446575	SAMPLE	Radium-226	0.597	0.159		0.0944	0.503	0.279	2.92			C03
101007SOMS2-02-0-C(5)	195902027	695969	1201446575	SAMPLE	Radium-228	0.638	0.233		0.193	0.445	0.172	2.82			C03
101007SOMS3-105-0-C(5)	195902028	695969	1201446575	SAMPLE	Cesium-137	1.81	0.202		0.0853	1.725	1.406	8.89			C03
101007SOMS3-105-0-C(5)	195902028	695969	1201446575	SAMPLE	Radium-226	1.23	0.221		0.143	1.087	0.788	4.86			C03
101007SOMS3-105-0-C(5)	195902028	695969	1201446575	SAMPLE	Radium-228	1.21	0.353		0.218	0.992	0.504	3.50			C03
101007SOMC-1-0-C(5)	195902030	695969	1201446575	SAMPLE	Cesium-137	0.268	0.0877		0.0739	0.194	0.093	2.93			C03
101007SOMC-1-0-C(5)	195902030	695969	1201446575	SAMPLE	Radium-226	1.16	0.199		0.130	1.030	0.762	4.98			C03
101007SOMC-1-0-C(5)	195902030	695969	1201446575	SAMPLE	Radium-228	1.43	0.341		0.259	1.171	0.748	4.24			C03
MB	1201446572	695967	1201446572	MB	Cesium-137	0.0101	0.0297	U	0.029						
MB	1201446572	695967	1201446572	MB	Radium-226	0.0152	0.0403	U	0.0733						
MB	1201446572	695967	1201446572	MB	Radium-228	-0.000673	0.0763	U	0.126						
101207SOMS2-26-0-C(5)	1201446573	695967	1201446572	DUP	Cesium-137	1.12	0.142		0.0851						
101207SOMS2-26-0-C(5)	1201446573	695967	1201446572	DUP	Radium-226	1.98	0.259		0.142						
101207SOMS2-26-0-C(5)	1201446573	695967	1201446572	DUP	Radium-228	1.49	0.348		0.235						
LCS	1201446574	695967	1201446572	LCS	Americium-241	87	1.13		0.481						
LCS	1201446574	695967	1201446572	LCS	Cesium-137	99	0.538		0.132						

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDC	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
LCS	1201446574	695967	1201446572	LCS	Cobalt-60	101	0.733		0.115						
MB	1201446575	695969	1201446575	MB	Cesium-137	0.00187	0.0238	U	0.0395						
MB	1201446575	695969	1201446575	MB	Radium-226	0.0459	0.102	U	0.0753						
MB	1201446575	695969	1201446575	MB	Radium-228	-0.0668	0.0912	U	0.139						
100907SOMS3-67-0-C(5)	1201446576	695969	1201446575	DUP	Cesium-137	0.799	0.132		0.0662					0.61	
100907SOMS3-67-0-C(5)	1201446576	695969	1201446575	DUP	Radium-226	1.13	0.190		0.123					0.05	
100907SOMS3-67-0-C(5)	1201446576	695969	1201446575	DUP	Radium-228	1.31	0.317		0.244					0.26	
LCS	1201446577	695969	1201446575	LCS	Americium-241	83	1.01		0.450						
LCS	1201446577	695969	1201446575	LCS	Cesium-137	95	0.510		0.129						
LCS	1201446577	695969	1201446575	LCS	Cobalt-60	96	0.683		0.104						
100907SOMS3-67-0-C(5)	195905001	695969	1201446575	SAMPLE	Cesium-137	1.04	0.145		0.0815						
100907SOMS3-67-0-C(5)	195905001	695969	1201446575	SAMPLE	Radium-226	1.16	0.202		0.131						
100907SOMS3-67-0-C(5)	195905001	695969	1201446575	SAMPLE	Radium-228	1.08	0.297		0.267						

Dupl RPD= Cesium-137 10
 Radium-226 -6
 Radium-228 -42

Dupl RPD= Cesium-137 -26
 Radium-226 -3
 Radium-228 19

MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 195905

Analytical Batches: 695969, 695970, and 695971

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method)

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	100907SOMS3-67-0-C(5)	10/09/07	195905001
2	100907SOMS-08-0-C(5)	10/09/07	195905002
3	100907SOMS3-63-0-C(5)	10/09/07	195905003
4	101107SOMS2-10-0-C(5)	10/11/07	195905004
5	101107SOMS4-15-0-C(5)	10/11/07	195905005
6	101007SOMS4-3-0-C(5)	10/10/07	195905006
7	100907SOMS3-59-0-C(5)	10/09/07	195905007
8	101107SOMS4-18-0-C(5)	10/11/07	195905009
9	100907SOMS3-60-0-C(5)	10/09/07	195905010
10	101007SOMS4-6-0-C(5)	10/10/07	195905011
11	101007SOMS2-14-0-C(5)	10/10/07	195905012
12	100907SOMS3-77-0-C(5)	10/09/07	195905013
13	101007SOMS3-03-0-C(5)	10/10/07	195905014
14	100907SOMSN-05-0-C(5)	10/09/07	195905015
15	100907SOMS3-73-0-C(5)	10/09/07	195905016
16	100907SOMS3-69-0-C(5)	10/09/07	195905018
17	101107SOMS3-87-0-C(5)	10/11/07	195905019
18	100907SOMS3-78-0-C(5)	10/09/07	195905020
19	101007SOMS-10-0-C(5)	10/10/07	195905021
20	101007SOMS3-52-0-C(5)	10/10/07	195905022
21	101007SOMS4-10-0-C(5)	10/10/07	195905023
22	101007SOMS3-04-0-C(5)	10/10/07	195905024
23	101007SOMS-09-0-C(5)	10/10/07	195905025
24	101007SOMS3-14-0-C(5)	10/10/07	195905026
25	101007SOMS2-13-0-C(5)	10/10/07	195905027
26	100907SOMS3-62-0-C(5)	10/09/07	195905028
27	101007SOMS3-51-0-C(5)	10/10/07	195905029
28	100907SOMS2-01-0-C(5)	10/09/07	195905030
29	101007SOMS4-1-0-C(5)	10/10/07	195905031
30	101007SOMS2-5-0-C(5)	10/10/07	195905032
31	101007SOMS2-6-0-C(5)	10/10/07	195905033
32	101007SOMS2-011-0-C(5)	10/10/07	195905034
33	101007SOMS3-02-0-C(5)	10/10/07	195905035

Note: Samples designated as QA Split Samples were reported in GEL SDG Nos. 196017 and 196021.

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

X Signatures on chain(s) and all samples accounted for
X ²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 33 soil samples were collected between October 9 and 11, 2007 in HDPE containers. All samples collected during this week were shipped in 11 coolers, and arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact. The 33 primary samples were prepared on October

23, 2007 and analyzed between October 31 and November 2, 2007, 22 to 24 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

- ____ Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples
- ____ Confirm matrix used in geometry standard
- ____ Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- ____ Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- ____ Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+/- limits
- ____ Resolution demonstration of relevant peak(s)
- ____ Listing of X/Y coordinates in constructing the control charts
- ____ Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- ____ Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
- Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results that were either less than two times the uncertainty were reported by the laboratory as not detected (U), or were greater than two times the uncertainty and greater than the minimum detectable concentration (MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result Minus 2*Uncert	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS2-10-0-C(5)	195905004	²²⁸ Ra	-0.339	0.779	UJ	Q09
100907SOMS3-59-0-C(5)	195905007	¹³⁷ Cs	-0.035	0.129	UJ	Q09
100907SOMS3-73-0-C(5)	195905016	²²⁶ Ra	-0.152	0.160	UJ	Q09
101007SOMS4-10-0-C(5)	195905023	¹³⁷ Cs	-0.026	0.0953	UJ	Q09
101007SOMS3-04-0-C(5)	195905024	²²⁸ Ra	-0.479	0.511	UJ	Q09
101007SOMS3-14-0-C(5)	195905026	¹³⁷ Cs	-0.010	0.188	UJ	Q09
101007SOMS3-51-0-C(5)	195905029	¹³⁷ Cs	-0.056	0.176	UJ	Q09
101007SOMS2-6-0-C(5)	195905033	¹³⁷ Cs	-0.017	0.144	UJ	Q09
101007SOMS2-011-0-C(5)	195905034	¹³⁷ Cs	-0.025	0.197	UJ	Q09

Results were flagged as not detected (UJ) at the reported concentrations because they failed both the above “two times uncertainty” criterion and the blank criterion specified in Section V below.

V. Blanks

Method blank results < MDC

Calculate normalized absolute difference (NAD) =

$$|(\text{Sample} - \text{Blank})| / (\sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2]})$$

If normalized absolute difference is > 2.58, no action necessary

If normalized absolute difference is between 1.96 and 2.58, qualify sample J
 If normalized absolute difference is less than 1.96, consider rejecting data

All normalized absolute differences (per above calculation) were greater than 2.58 for all sample results that were reportable (that is, reported as a detection above the MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
100907SOMS-08-0-C(5)	195905002	^{137}Cs	2.13	0.171	J	B01
101107SOMS2-10-0-C(5)	195905004	^{228}Ra	1.49	0.779	UJ	B01
100907SOMS3-59-0-C(5)	195905007	^{137}Cs	1.49	0.129	UJ	B01
101107SOMS4-18-0-C(5)	195905009	^{228}Ra	2.57	0.582	J	B01
100907SOMS3-60-0-C(5)	195905010	^{137}Cs	2.55	0.269	J	B01
101007SOMS4-6-0-C(5)	195905011	^{137}Cs	1.97	0.152	J	B01
101007SOMS2-14-0-C(5)	195905012	^{137}Cs	2.00	0.211	J	B01
101007SOMS-03-0-C(5)	195905014	^{137}Cs	2.32	0.212	J	B01
100907SOMSN-05-0-C(5)	195905015	^{137}Cs	1.83	0.148	J	B01
100907SOMS3-73-0-C(5)	195905016	^{226}Ra	0.59	0.160	UJ	B01
100907SOMS3-69-0-C(5)	195905018	^{137}Cs	2.53	0.193	J	B01
101007SOMS-10-0-C(5)	195905021	^{228}Ra	2.34	1.18	J	B01
101007SOMS3-52-0-C(5)	195905022	^{137}Cs	2.26	0.194	J	B01
101007SOMS4-10-0-C(5)	195905023	^{137}Cs	0.96	0.0953	UJ	B01
101007SOMS3-04-0-C(5)	195905024	^{228}Ra	0.94	0.511	UJ	B01
101007SOMS-09-0-C(5)	195905025	^{137}Cs	1.83	0.189	J	B01
101007SOMS3-14-0-C(5)	195905026	^{137}Cs	1.53	0.188	UJ	B01
101007SOMS2-13-0-C(5)	195905027	^{137}Cs	1.68	0.146	J	B01
101007SOMS3-51-0-C(5)	195905029	^{137}Cs	1.22	0.176	UJ	B01
100907SOMS2-01-0-C(5)	195905030	^{228}Ra	1.92	0.399	J	B01
101007SOMS2-6-0-C(5)	195905033	^{137}Cs	1.69	0.144	UJ	B01
101007SOMS2-011-0-C(5)	195905034	^{137}Cs	1.72	0.197	UJ	B01
101007SOMS2-011-0-C(5)	195905034	^{228}Ra	2.16	0.991	J	B01
101007SOMS3-02-0-C(5)	195905035	^{137}Cs	2.14	0.196	J	B01

VI. Laboratory Duplicates

Must be analyzed for each batch or for every 20 samples

RPDs within the laboratory's control limits (RPD not calculated when one or both duplicate results are not detected)

Calculate the duplicate error ratio (DER)) =

$$|(\text{Sample} - \text{Duplicate})| / (2 * \sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2]})$$

DER \leq 1.42

If DER > 1.42, qualify sample J

The laboratory's laboratory duplicate criteria are: If duplicate activities are less than 5 times MDC, then the RPD should be less than 100%; if activities are greater than 5 times the MDC, the RPD should be less than 20%.

With the following exception, all RPDs and DERs associated with both laboratory duplicate pairs were within these criteria:

Field Sample Identification	Laboratory Sample Identification	Parameter	RPD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
100907SOMS3-67-0-C(5)	195905001	¹³⁷ Cs	26	1.04	None	None

Although the RPD of 26 for this duplicate pair was greater than the control limit of 20, the DER of 0.61 was within control. The variance does not constitute a significant difference, so neither the primary sample results nor associated samples results were qualified.

VII. Laboratory Control Samples

- Must be analyzed for each batch or for every 20 samples
 Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Equipment and Water Blank Samples

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ²²⁶Ra and ¹³⁷Cs (see data validation report for GEL SDG 195907). All equipment blanks and water blanks were not detected for both ²²⁶Ra and ¹³⁷Cs.

IX. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
100907SOMS-08-0-C(5)	195905002	¹³⁷ Cs	0.171	J	B01
101107SOMS2-10-0-C(5)	195905004	²²⁸ Ra	0.779	UJ	Q09,B01
100907SOMS3-59-0-C(5)	195905007	¹³⁷ Cs	0.129	UJ	Q09,B01
101107SOMS4-18-0-C(5)	195905009	²²⁸ Ra	0.582	J	B01
100907SOMS3-60-0-C(5)	195905010	¹³⁷ Cs	0.269	J	B01
101007SOMS4-6-0-C(5)	195905011	¹³⁷ Cs	0.152	J	B01
101007SOMS2-14-0-C(5)	195905012	¹³⁷ Cs	0.211	J	B01
101007SOMS-03-0-C(5)	195905014	¹³⁷ Cs	0.212	J	B01

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
100907SOMSN-05-0-C(5)	195905015	^{137}Cs	0.148	J	B01
100907SOMS3-73-0-C(5)	195905016	^{226}Ra	0.160	UJ	Q09,B01
100907SOMS3-69-0-C(5)	195905018	^{137}Cs	0.193	J	B01
101007SOMS-10-0-C(5)	195905021	^{228}Ra	1.18	J	B01
101007SOMS3-52-0-C(5)	195905022	^{137}Cs	0.194	J	B01
101007SOMS4-10-0-C(5)	195905023	^{137}Cs	0.0953	UJ	Q09,B01
101007SOMS3-04-0-C(5)	195905024	^{228}Ra	0.511	UJ	Q09,B01
101007SOMS-09-0-C(5)	195905025	^{137}Cs	0.189	J	B01
101007SOMS3-14-0-C(5)	195905026	^{137}Cs	0.188	UJ	Q09,B01
101007SOMS2-13-0-C(5)	195905027	^{137}Cs	0.146	J	B01
101007SOMS3-51-0-C(5)	195905029	^{137}Cs	0.176	UJ	Q09,B01
100907SOMS2-01-0-C(5)	195905030	^{228}Ra	0.399	J	B01
101007SOMS2-6-0-C(5)	195905033	^{137}Cs	0.144	UJ	Q09,B01
101007SOMS2-011-0-C(5)	195905034	^{137}Cs	0.197	UJ	Q09,B01
101007SOMS2-011-0-C(5)	195905034	^{228}Ra	0.991	J	B01
101007SOMS3-02-0-C(5)	195905035	^{137}Cs	0.196	J	B01

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency
L04	LCS not the same matrix as the analytical samples

Reason Code	Definition
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Typ	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
100907SOMS3-67-0-C(5)	195905001	695969	1201446575	SAMPLE	Cesium-137	1.04	0.145		0.0815	0.959	0.750	7.06	0.61		C03
100907SOMS3-67-0-C(5)	195905001	695969	1201446575	SAMPLE	Radium-226	1.16	0.202		0.131	1.029	0.756	4.92	0.05		C03
100907SOMS3-67-0-C(5)	195905001	695969	1201446575	SAMPLE	Radium-228	1.08	0.297		0.267	0.813	0.486	3.69	0.26		C03
100907SOMS-08-0-C(5)	195905002	695969	1201446575	SAMPLE	Cesium-137	0.171	0.0757		0.067	0.104	0.020	2.13		J	B01,C03
100907SOMS-08-0-C(5)	195905002	695969	1201446575	SAMPLE	Radium-226	1.23	0.203		0.123	1.107	0.824	5.21			C03
100907SOMS-08-0-C(5)	195905002	695969	1201446575	SAMPLE	Radium-228	1.17	0.330		0.229	0.941	0.510	3.61			C03
100907SOMS3-63-0-C(5)	195905003	695969	1201446575	SAMPLE	Cesium-137	0.255	0.0842		0.0579	0.197	0.087	2.89			C03
100907SOMS3-63-0-C(5)	195905003	695969	1201446575	SAMPLE	Radium-226	1.08	0.181		0.109	0.971	0.718	4.98			C03
100907SOMS3-63-0-C(5)	195905003	695969	1201446575	SAMPLE	Radium-228	1.22	0.341		0.225	0.995	0.538	3.65			C03
101107SOMS2-10-0-C(5)	195905004	695969	1201446575	SAMPLE	Cesium-137	1.03	0.147		0.102	0.928	0.736	6.90			C03
101107SOMS2-10-0-C(5)	195905004	695969	1201446575	SAMPLE	Radium-226	5.18	0.581		0.192	4.988	4.018	8.70			C03
101107SOMS2-10-0-C(5)	195905004	695969	1201446575	SAMPLE	Radium-228	0.779	0.559		0.416	0.363	-0.339	1.49		UJ	Q09,B01,C03
101107SOMS4-15-0-C(5)	195905005	695969	1201446575	SAMPLE	Cesium-137	1.49	0.157		0.0774	1.413	1.176	9.37			C03
101107SOMS4-15-0-C(5)	195905005	695969	1201446575	SAMPLE	Radium-226	2.41	0.284		0.126	2.284	1.842	7.83			C03
101107SOMS4-15-0-C(5)	195905005	695969	1201446575	SAMPLE	Radium-228	0.903	0.303		0.233	0.670	0.297	3.06			C03
101007SOMS4-3-0-C(5)	195905006	695969	1201446575	SAMPLE	Cesium-137	0.277	0.0633		0.0549	0.222	0.150	4.07			C03
101007SOMS4-3-0-C(5)	195905006	695969	1201446575	SAMPLE	Radium-226	1.26	0.184		0.0921	1.168	0.892	5.77			C03
101007SOMS4-3-0-C(5)	195905006	695969	1201446575	SAMPLE	Radium-228	1.30	0.279		0.179	1.121	0.742	4.66			C03
100907SOMS3-59-0-C(5)	195905007	695969	1201446575	SAMPLE	Cesium-137	0.129	0.0818		0.0793	0.050	-0.035	1.49		UJ	Q09,B01,C03
100907SOMS3-59-0-C(5)	195905007	695969	1201446575	SAMPLE	Radium-226	1.23	0.252		0.135	1.095	0.726	4.36			C03
100907SOMS3-59-0-C(5)	195905007	695969	1201446575	SAMPLE	Radium-228	1.19	0.349		0.291	0.899	0.492	3.48			C03
101107SOMS4-18-0-C(5)	195905009	695969	1201446575	SAMPLE	Cesium-137	0.0594	0.0441	U	0.0827	-0.023	-0.029	1.15			C03
101107SOMS4-18-0-C(5)	195905009	695969	1201446575	SAMPLE	Radium-226	1.67	0.215		0.129	1.541	1.240	6.82			C03
101107SOMS4-18-0-C(5)	195905009	695969	1201446575	SAMPLE	Radium-228	0.582	0.235		0.281	0.301	0.112	2.57		J	B01,C03
100907SOMS3-60-0-C(5)	195905010	695970	1201446578	SAMPLE	Cesium-137	0.269	0.088		0.0876	0.181	0.093	2.55		J	B01,C03
100907SOMS3-60-0-C(5)	195905010	695970	1201446578	SAMPLE	Radium-226	1.64	0.260		0.145	1.495	1.120	5.85			C03
100907SOMS3-60-0-C(5)	195905010	695970	1201446578	SAMPLE	Radium-228	1.20	0.367		0.288	0.912	0.466	2.99			C03
101007SOMS4-6-0-C(5)	195905011	695970	1201446578	SAMPLE	Cesium-137	0.152	0.0531		0.0738	0.078	0.046	1.97		J	B01,C03
101007SOMS4-6-0-C(5)	195905011	695970	1201446578	SAMPLE	Radium-226	0.993	0.204		0.113	0.880	0.585	4.30			C03
101007SOMS4-6-0-C(5)	195905011	695970	1201446578	SAMPLE	Radium-228	1.57	0.363		0.220	1.350	0.844	3.97			C03
101007SOMS2-14-0-C(5)	195905012	695970	1201446578	SAMPLE	Cesium-137	0.211	0.0849		0.0812	0.130	0.041	2.00		J	B01,C03
101007SOMS2-14-0-C(5)	195905012	695970	1201446578	SAMPLE	Radium-226	0.993	0.225		0.131	0.862	0.543	3.94			C03
101007SOMS2-14-0-C(5)	195905012	695970	1201446578	SAMPLE	Radium-228	1.35	0.348		0.234	1.116	0.654	3.53			C03
100907SOMS3-77-0-C(5)	195905013	695970	1201446578	SAMPLE	Cesium-137	0.807	0.0973		0.0477	0.759	0.612	7.57			C03
100907SOMS3-77-0-C(5)	195905013	695970	1201446578	SAMPLE	Radium-226	0.777	0.151		0.100	0.677	0.475	4.26			C03
100907SOMS3-77-0-C(5)	195905013	695970	1201446578	SAMPLE	Radium-228	0.701	0.205		0.145	0.556	0.291	2.73			C03
101007SOMS-03-0-C(5)	195905014	695970	1201446578	SAMPLE	Cesium-137	0.212	0.0715		0.0695	0.143	0.069	2.32		J	B01,C03
101007SOMS-03-0-C(5)	195905014	695970	1201446578	SAMPLE	Radium-226	1.63	0.202		0.121	1.509	1.226	7.30			C03
101007SOMS-03-0-C(5)	195905014	695970	1201446578	SAMPLE	Radium-228	1.51	0.337		0.241	1.269	0.836	4.07			C03
100907SOMSN-05-0-C(5)	195905015	695970	1201446578	SAMPLE	Cesium-137	0.148	0.0559		0.0641	0.084	0.036	1.83		J	B01,C03
100907SOMSN-05-0-C(5)	195905015	695970	1201446578	SAMPLE	Radium-226	1.14	0.184		0.118	1.022	0.772	5.45			C03
100907SOMSN-05-0-C(5)	195905015	695970	1201446578	SAMPLE	Radium-228	1.17	0.294		0.199	0.971	0.582	3.52			C03
100907SOMS3-73-0-C(5)	195905016	695970	1201446578	SAMPLE	Cesium-137	0.759	0.112		0.0707	0.688	0.535	6.25			C03
100907SOMS3-73-0-C(5)	195905016	695970	1201446578	SAMPLE	Radium-226	0.160	0.156		0.113	0.047	-0.152	0.59		UJ	Q09,B01,C03
100907SOMS3-73-0-C(5)	195905016	695970	1201446578	SAMPLE	Radium-228	0.178	0.192	U	0.317	-0.139	-0.206	0.63			C03

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Typ	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
100907SOMS3-69-0-C(5)	195905018	695970	1201446578	SAMPLE	Cesium-137	0.193	0.0557		0.0507	0.142	0.082	2.53		J	B01,C03
100907SOMS3-69-0-C(5)	195905018	695970	1201446578	SAMPLE	Radium-226	0.999	0.154		0.0931	0.906	0.691	5.49			C03
100907SOMS3-69-0-C(5)	195905018	695970	1201446578	SAMPLE	Radium-228	1.10	0.285		0.154	0.946	0.530	3.39			C03
101107SOMS3-87-0-C(5)	195905019	695970	1201446578	SAMPLE	Cesium-137	0.281	0.0682		0.0589	0.222	0.145	3.32			C03
101107SOMS3-87-0-C(5)	195905019	695970	1201446578	SAMPLE	Radium-226	1.34	0.234		0.138	1.202	0.872	5.22			C03
101107SOMS3-87-0-C(5)	195905019	695970	1201446578	SAMPLE	Radium-228	1.08	0.293		0.261	0.819	0.494	3.25			C03
100907SOMS3-78-0-C(5)	195905020	695970	1201446578	SAMPLE	Cesium-137	0.274	0.056		0.0545	0.220	0.162	3.76			C03
100907SOMS3-78-0-C(5)	195905020	695970	1201446578	SAMPLE	Radium-226	1.05	0.176		0.0993	0.951	0.698	5.19			C03
100907SOMS3-78-0-C(5)	195905020	695970	1201446578	SAMPLE	Radium-228	1.15	0.330		0.192	0.958	0.490	3.14			C03
101007SOMS-10-0-C(5)	195905021	695970	1201446578	SAMPLE	Cesium-137	0.366	0.108		0.129	0.237	0.150	2.98			C03
101007SOMS-10-0-C(5)	195905021	695970	1201446578	SAMPLE	Radium-226	6.46	0.712		0.191	6.269	5.036	8.94			C03
101007SOMS-10-0-C(5)	195905021	695970	1201446578	SAMPLE	Radium-228	1.18	0.472		0.375	0.805	0.236	2.34	J	B01,C03	
101007SOMS3-52-0-C(5)	195905022	695970	1201446578	SAMPLE	Cesium-137	0.194	0.0652		0.0703	0.124	0.064	2.26	J	B01,C03	
101007SOMS3-52-0-C(5)	195905022	695970	1201446578	SAMPLE	Radium-226	1.30	0.187		0.109	1.191	0.926	6.16			C03
101007SOMS3-52-0-C(5)	195905022	695970	1201446578	SAMPLE	Radium-228	1.51	0.316		0.193	1.317	0.878	4.30			C03
101007SOMS4-10-0-C(5)	195905023	695970	1201446578	SAMPLE	Cesium-137	0.0953	0.0606		0.0643	0.031	-0.026	0.96	UJ	Q09,B01,C03	
101007SOMS4-10-0-C(5)	195905023	695970	1201446578	SAMPLE	Radium-226	0.905	0.157		0.112	0.793	0.591	4.87			C03
101007SOMS4-10-0-C(5)	195905023	695970	1201446578	SAMPLE	Radium-228	1.21	0.349		0.223	0.987	0.512	3.15			C03
101007SOMS3-04-0-C(5)	195905024	695970	1201446578	SAMPLE	Cesium-137	1.14	0.159		0.116	1.024	0.822	6.84			C03
101007SOMS3-04-0-C(5)	195905024	695970	1201446578	SAMPLE	Radium-226	9.60	0.971		0.186	9.414	7.658	9.80			C03
101007SOMS3-04-0-C(5)	195905024	695970	1201446578	SAMPLE	Radium-228	0.511	0.495		0.456	0.055	-0.479	0.94	UJ	Q09,B01,C03	
101007SOMS-09-0-C(5)	195905025	695970	1201446578	SAMPLE	Cesium-137	0.189	0.0811		0.0596	0.129	0.027	1.83	J	B01,C03	
101007SOMS-09-0-C(5)	195905025	695970	1201446578	SAMPLE	Radium-226	1.70	0.229		0.109	1.591	1.242	6.81			C03
101007SOMS-09-0-C(5)	195905025	695970	1201446578	SAMPLE	Radium-228	1.44	0.375		0.200	1.240	0.690	3.54			C03
101007SOMS3-14-0-C(5)	195905026	695970	1201446578	SAMPLE	Cesium-137	0.188	0.0989		0.0607	0.127	-0.010	1.53	UJ	Q09,B01,C03	
101007SOMS3-14-0-C(5)	195905026	695970	1201446578	SAMPLE	Radium-226	1.15	0.216		0.115	1.035	0.718	4.78			C03
101007SOMS3-14-0-C(5)	195905026	695970	1201446578	SAMPLE	Radium-228	1.45	0.316		0.200	1.250	0.818	4.13			C03
101007SOMS2-13-0-C(5)	195905027	695970	1201446578	SAMPLE	Cesium-137	0.146	0.0615		0.0531	0.093	0.023	1.68	J	B01,C03	
101007SOMS2-13-0-C(5)	195905027	695970	1201446578	SAMPLE	Radium-226	1.22	0.192		0.102	1.118	0.836	5.64			C03
101007SOMS2-13-0-C(5)	195905027	695970	1201446578	SAMPLE	Radium-228	1.29	0.238		0.188	1.102	0.814	4.60			C03
100907SOMS3-62-0-C(5)	195905028	695970	1201446578	SAMPLE	Cesium-137	0.294	0.0735		0.0749	0.219	0.147	3.29			C03
100907SOMS3-62-0-C(5)	195905028	695970	1201446578	SAMPLE	Radium-226	0.747	0.173		0.139	0.608	0.401	3.65			C03
100907SOMS3-62-0-C(5)	195905028	695970	1201446578	SAMPLE	Radium-228	1.34	0.301		0.255	1.085	0.738	3.97			C03
101007SOMS3-51-0-C(5)	195905029	695970	1201446578	SAMPLE	Cesium-137	0.176	0.116		0.092	0.084	-0.056	1.22	UJ	Q09,B01,C03	
101007SOMS3-51-0-C(5)	195905029	695970	1201446578	SAMPLE	Radium-226	1.01	0.280		0.139	0.871	0.450	3.28			C03
101007SOMS3-51-0-C(5)	195905029	695970	1201446578	SAMPLE	Radium-228	1.20	0.411		0.283	0.917	0.378	2.70			C03
100907SOMS2-01-0-C(5)	195905030	695970	1201446578	SAMPLE	Cesium-137	0.0167	0.0276	U	0.0493	-0.033	-0.039	0.28	0.16		C03
100907SOMS2-01-0-C(5)	195905030	695970	1201446578	SAMPLE	Radium-226	0.514	0.110		0.0846	0.429	0.294	3.43	0.34		C03
100907SOMS2-01-0-C(5)	195905030	695970	1201446578	SAMPLE	Radium-228	0.399	0.136		0.139	0.260	0.127	1.92	0.53	J	B01,C03
101007SOMS4-1-0-C(5)	195905031	695971	1201446581	SAMPLE	Cesium-137	0.253	0.076		0.0736	0.179	0.101	3.15			C03
101007SOMS4-1-0-C(5)	195905031	695971	1201446581	SAMPLE	Radium-226	1.13	0.190		0.107	1.023	0.750	5.83			C03
101007SOMS4-1-0-C(5)	195905031	695971	1201446581	SAMPLE	Radium-228	1.58	0.340		0.251	1.329	0.900	4.60			C03
101007SOMS2-5-0-C(5)	195905032	695971	1201446581	SAMPLE	Cesium-137	0.179	0.0583		0.0581	0.121	0.062	2.81			C03
101007SOMS2-5-0-C(5)	195905032	695971	1201446581	SAMPLE	Radium-226	1.62	0.209		0.101	1.519	1.202	7.59			C03
101007SOMS2-5-0-C(5)	195905032	695971	1201446581	SAMPLE	Radium-228	1.41	0.283		0.169	1.241	0.844	4.86			C03

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Typ	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101007SOMS2-6-0-C(5)	195905033	695971	1201446581	SAMPLE	Cesium-137	0.144	0.0807		0.0728	0.071	-0.017	1.69		UJ	Q09,B01,C03
101007SOMS2-6-0-C(5)	195905033	695971	1201446581	SAMPLE	Radium-226	1.43	0.212		0.124	1.306	1.006	6.63			C03
101007SOMS2-6-0-C(5)	195905033	695971	1201446581	SAMPLE	Radium-228	1.22	0.285		0.216	1.004	0.650	4.21			C03
101007SOMS2-011-0-C(5)	195905034	695971	1201446581	SAMPLE	Cesium-137	0.197	0.111		0.140	0.057	-0.025	1.72		UJ	Q09,B01,C03
101007SOMS2-011-0-C(5)	195905034	695971	1201446581	SAMPLE	Radium-226	4.85	0.566		0.235	4.615	3.718	8.58			C03
101007SOMS2-011-0-C(5)	195905034	695971	1201446581	SAMPLE	Radium-228	0.991	0.475		0.450	0.541	0.041	2.16	J	B01,C03	
101007SOMS3-02-0-C(5)	195905035	695971	1201446581	SAMPLE	Cesium-137	0.196	0.0874		0.084	0.112	0.021	2.14	J	B01,C03	
101007SOMS3-02-0-C(5)	195905035	695971	1201446581	SAMPLE	Radium-226	1.33	0.230		0.141	1.189	0.870	5.73			C03
101007SOMS3-02-0-C(5)	195905035	695971	1201446581	SAMPLE	Radium-228	1.17	0.355		0.276	0.894	0.460	3.32			C03
MB	1201446575	695969	1201446575	MB	Cesium-137	0.00187	0.0238	U	0.0395						
MB	1201446575	695969	1201446575	MB	Radium-226	0.0459	0.102	U	0.0753						
MB	1201446575	695969	1201446575	MB	Radium-228	-0.0668	0.0912	U	0.139						
100907SOMS3-67-0-C(5)	1201446576	695969	1201446575	DUP	Cesium-137	0.799	0.132		0.0662						
100907SOMS3-67-0-C(5)	1201446576	695969	1201446575	DUP	Radium-226	1.13	0.190		0.123						
100907SOMS3-67-0-C(5)	1201446576	695969	1201446575	DUP	Radium-228	1.31	0.317		0.244						
MB	1201446578	695970	1201446578	MB	Cesium-137	0.0287	0.0333	U	0.0616						
MB	1201446578	695970	1201446578	MB	Radium-226	0.0582	0.0749	U	0.128						
MB	1201446578	695970	1201446578	MB	Radium-228	0.0296	0.136	U	0.252						
100907SOMS2-01-0-C(5)	1201446579	695970	1201446578	DUP	Cesium-137	0.00	0.0436	UI	0.049						
100907SOMS2-01-0-C(5)	1201446579	695970	1201446578	DUP	Radium-226	0.393	0.139		0.106						
100907SOMS2-01-0-C(5)	1201446579	695970	1201446578	DUP	Radium-228	0.156	0.182	U	0.265						
MB	1201446581	695971	1201446581	MB	Cesium-137	0.0016	0.0243	U	0.0423						
MB	1201446581	695971	1201446581	MB	Radium-226	-0.0364	0.0625	U	0.101						
MB	1201446581	695971	1201446581	MB	Radium-228	-0.0635	0.109	U	0.170						
101207SOMS3-27-0-C(5)	195906001	695971	1201446581	PRIMARY	Cesium-137	0.225	0.0882		0.0615			0.22			
101207SOMS3-27-0-C(5)	195906001	695971	1201446581	PRIMARY	Radium-226	1.10	0.172		0.118			0.28			
101207SOMS3-27-0-C(5)	195906001	695971	1201446581	PRIMARY	Radium-228	1.26	0.297		0.202			0.19			
101207SOMS3-27-0-C(5)	1201446582	695971	1201446581	DUP	Cesium-137	0.274	0.0657		0.079						
101207SOMS3-27-0-C(5)	1201446582	695971	1201446581	DUP	Radium-226	1.25	0.207		0.124						
101207SOMS3-27-0-C(5)	1201446582	695971	1201446581	DUP	Radium-228	1.08	0.382		0.280						

Dupl RPD= Cesium-137 26
 Radium-226 2.6
 Radium-228 -19

Dupl RPD= Cesium-137 NDs
 Radium-226 27
 Radium-228 88

Dupl RPD= Cesium-137 -20
 Radium-226 -13
 Radium-228 15

**ATTACHMENT B: DATA VALIDATION_WORKSHEET
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MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 195906

Analytical Batches: 695971 and 695972

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method)

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	101207SOMS3-27-0-C(5)	10/12/07	195906001
2	101107SOMS3-36-0-C(3)	10/11/07	195906002
3	101207SOMS3-31-0-C(5)	10/12/07	195906003
4	101207SOMS3-97-0-C(5)	10/12/07	195906004
5	101207SOMS2-22-0-C(5)	10/12/07	195906005
6	101007SOME-2-0-C(5)	10/10/07	195906007
7	101207SOMS3-28-0-C(5)	10/12/07	195906008
8	101307SOMF-1-0-C(5)	10/13/07	195906010
9	101307SOMF-2-0-C(5)	10/13/07	195906011
10	101307SOMA-1-0-C(5)	10/13/07	195906012
11	101307SOMBACk-3-0-C(5)	10/13/07	195906013
12	101207SOMS3-38-0-C(5)	10/12/07	195906014
13	101207SOMS2-04-0-C(5)	10/12/07	195906015
14	101307SOMG-1-0-C(5)	10/13/07	195906016
15	101307SOMBACk-1-0-C(5)	10/13/07	195906017
16	101307SOMA-2-0-C(5)	10/13/07	195906018
17	101207SOMS3-40-0-C(5)	10/12/07	195906019
18	101307SOMBACk-2-0-C(5)	10/13/07	195906020
19	101207SOMS3-95-0-C(5)	10/12/07	195906021
20	101207SOMS3-33-0-C(5)	10/12/07	195906022
21	101207SOMS3-35-0-C(5)	10/12/07	195906023
22	101207SOMS3-107-0-C(5)	10/12/07	195906024
23	101207SOMS3-29-0-C(5)	10/12/07	195906026
24	101207SOMS3-96-0-C(5)	10/12/07	195906027
25	101207SOML1-06-0-C(5)	10/12/07	195906028
26	101307SOMS3-94-0-C(5)	10/13/07	195906029
27	101307SOMS3-66-0-C(5)	10/13/07	195906030

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

Signatures on chain(s) and all samples accounted for

²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 27 soil samples were collected between October 11 and 13, 2007 in HDPE containers. All samples collected during this week were shipped in 11 coolers, and arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact. The 27 primary samples were prepared on October 23, 2007 and analyzed on October 31 and November 1 2007, 18 to 22 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples

Confirm matrix used in geometry standard

Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate

Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+/- limits
- Resolution demonstration of relevant peak(s)
- Listing of X/Y coordinates in constructing the control charts
- Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
- Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results that were either less than two times the uncertainty were reported by the laboratory as not detected (U), or were greater than two times the uncertainty and greater than the minimum detectable concentration (MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result Minus 2*Uncert	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101307SOMA-2-0-C(5)	195906018	¹³⁷ Cs	-0.028	0.158	UJ	Q09
101207SOMS3-107-0-C(5)	195906024	¹³⁷ Cs	-0.003	0.157	UJ	Q09

Results were flagged as not detected (UJ) at the reported concentrations because they failed both the above “two times uncertainty” criterion and the blank criterion specified in Section V below.

Additionally, the laboratory qualified the following sample as footnoted:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101307SOMA-1-0-C(5)	195906012	¹³⁷ Cs	0.00 UI ^a	UJ	Q02

^a Data rejected due to no valid peak.

“Data rejected due to no valid peak” is interpreted to be that there was positive interference at the target frequency that did not meet the qualitative criteria for the target isotope, so the observed result is treated as not detected (UJ).

V. Blanks

- Method blank results < MDC
- Calculate normalized absolute difference (NAD) =

$$|(\text{Sample} - \text{Blank})| / (\sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2]})^{1/2}$$
- If normalized absolute difference is > 2.58, no action necessary
- If normalized absolute difference is between 1.96 and 2.58, qualify sample J
- If normalized absolute difference is less than 1.96, consider rejecting data

All normalized absolute differences (per above calculation) were greater than 2.58 for all sample results that were reportable (that is, reported as a detection above the MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101207SOMS3-27-0-C(5)	195906001	^{137}Cs	2.44	0.0882	J	B01
101107SOMS3-36-0-C(3)	195906002	^{228}Ra	2.17	0.430	J	B01
101207SOMS3-31-0-C(5)	195906003	^{137}Cs	2.29	0.0906	J	B01
101307SOMF-1-0-C(5)	195906010	^{137}Cs	2.15	0.0577	J	B01
101307SOMA-2-0-C(5)	195906018	^{137}Cs	1.65	0.0931	UJ	B01
101207SOMS3-33-0-C(5)	195906022	^{228}Ra	2.50	0.258	J	B01
101207SOMS3-107-0-C(5)	195906024	^{137}Cs	1.90	0.0799	UJ	B01
101307SOMS3-66-0-C(5)	195906030	^{137}Cs	2.45	0.0722	J	B01

VI. Laboratory Duplicates

- Must be analyzed for each batch or for every 20 samples
- RPDs within the laboratory's control limits (RPD not calculated when one or both duplicate results are not detected)
- Calculate the duplicate error ratio (DER)) =

$$|(\text{Sample} - \text{Duplicate})| / (2 * \sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2]})^{1/2}$$
- $\text{DER} \leq 1.42$
- If DER > 1.42, qualify sample J

The laboratory's laboratory duplicate criteria are: If duplicate activities are less than 5 times MDC, then the RPD should be less than 100%; if activities are greater than 5 times the MDC, the RPD should be less than 20%.

All RPDs and DERs associated with both laboratory duplicate pairs were within these criteria.

VII. Laboratory Control Samples

- Must be analyzed for each batch or for every 20 samples
- Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Equipment and Water Blank Samples

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ^{226}Ra and ^{137}Cs (see data validation report for GEL SDG 195907). All equipment blanks and water blanks were not detected for both ^{226}Ra and ^{137}Cs .

IX. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
101207SOMS3-27-0-C(5)	195906001	^{137}Cs	0.0882	J	B01
101107SOMS3-36-0-C(3)	195906002	^{228}Ra	0.430	J	B01
101207SOMS3-31-0-C(5)	195906003	^{137}Cs	0.0906	J	B01
101307SOMF-1-0-C(5)	195906010	^{137}Cs	0.0577	J	B01
101307SOMA-1-0-C(5)	195906012	^{137}Cs	0.00 UI	UJ	Q02
101307SOMA-2-0-C(5)	195906018	^{137}Cs	0.0931	UJ	Q09,B01
101207SOMS3-33-0-C(5)	195906022	^{228}Ra	0.258	J	B01
101207SOMS3-107-0-C(5)	195906024	^{137}Cs	0.0799	UJ	Q09,B01
101307SOMS3-66-0-C(5)	195906030	^{137}Cs	0.0722	J	B01

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency
L04	LCS not the same matrix as the analytical samples

Reason Code	Definition
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101207SOMS3-27-0-C(5)	195906001	695971	1201446581	SAMPLE	Cesium-137	0.225	0.0882		0.0615	0.164	0.049	2.44	0.22	J	B01,C03
101207SOMS3-27-0-C(5)	195906001	695971	1201446581	SAMPLE	Radium-226	1.10	0.172		0.118	0.982	0.756	6.21	0.28		C03
101207SOMS3-27-0-C(5)	195906001	695971	1201446581	SAMPLE	Radium-228	1.26	0.297		0.202	1.058	0.666	4.18	0.19		C03
101107SOMS3-36-0-C(3)	195906002	695971	1201446581	SAMPLE	Cesium-137	0.570	0.126		0.128	0.442	0.318	4.43			C03
101107SOMS3-36-0-C(3)	195906002	695971	1201446581	SAMPLE	Radium-226	6.32	0.685		0.199	6.121	4.950	9.24			C03
101107SOMS3-36-0-C(3)	195906002	695971	1201446581	SAMPLE	Radium-228	0.898	0.430		0.410	0.488	0.038	2.17		J	B01,C03
101207SOMS3-31-0-C(5)	195906003	695971	1201446581	SAMPLE	Cesium-137	0.216	0.0906		0.0636	0.152	0.035	2.29		J	B01,C03
101207SOMS3-31-0-C(5)	195906003	695971	1201446581	SAMPLE	Radium-226	1.22	0.176		0.129	1.091	0.868	6.73			C03
101207SOMS3-31-0-C(5)	195906003	695971	1201446581	SAMPLE	Radium-228	1.21	0.317		0.229	0.981	0.576	3.80			C03
101207SOMS3-97-0-C(5)	195906004	695971	1201446581	SAMPLE	Cesium-137	0.405	0.0723		0.0573	0.348	0.260	5.29			C03
101207SOMS3-97-0-C(5)	195906004	695971	1201446581	SAMPLE	Radium-226	1.17	0.170		0.0991	1.071	0.830	6.66			C03
101207SOMS3-97-0-C(5)	195906004	695971	1201446581	SAMPLE	Radium-228	1.02	0.254		0.173	0.847	0.512	3.92			C03
101207SOMS2-22-0-C(5)	195906005	695971	1201446581	SAMPLE	Cesium-137	0.0257	0.0341	U	0.0446	-0.019	-0.043	0.58			C03
101207SOMS2-22-0-C(5)	195906005	695971	1201446581	SAMPLE	Radium-226	1.06	0.171		0.096	0.964	0.718	6.02			C03
101207SOMS2-22-0-C(5)	195906005	695971	1201446581	SAMPLE	Radium-228	1.27	0.257		0.152	1.118	0.756	4.78			C03
101007SOME-2-0-C(5)	195906007	695971	1201446581	SAMPLE	Cesium-137	0.515	0.0891		0.0922	0.423	0.337	5.56			C03
101007SOME-2-0-C(5)	195906007	695971	1201446581	SAMPLE	Radium-226	1.11	0.221		0.163	0.947	0.668	4.99			C03
101007SOME-2-0-C(5)	195906007	695971	1201446581	SAMPLE	Radium-228	1.19	0.366		0.319	0.871	0.458	3.28			C03
101207SOMS3-28-0-C(5)	195906008	695971	1201446581	SAMPLE	Cesium-137	-0.017	0.0436	U	0.0725	-0.090	-0.104	0.37			C03
101207SOMS3-28-0-C(5)	195906008	695971	1201446581	SAMPLE	Radium-226	1.20	0.200		0.135	1.065	0.800	5.90			C03
101207SOMS3-28-0-C(5)	195906008	695971	1201446581	SAMPLE	Radium-228	0.995	0.296		0.236	0.759	0.403	3.36			C03
101307SOMF-1-0-C(5)	195906010	695971	1201446581	SAMPLE	Cesium-137	0.136	0.0577		0.0749	0.061	0.021	2.15		J	B01,C03
101307SOMF-1-0-C(5)	195906010	695971	1201446581	SAMPLE	Radium-226	0.964	0.162		0.113	0.851	0.640	5.76			C03
101307SOMF-1-0-C(5)	195906010	695971	1201446581	SAMPLE	Radium-228	1.44	0.299		0.228	1.212	0.842	4.72			C03
101307SOMF-2-0-C(5)	195906011	695971	1201446581	SAMPLE	Cesium-137	0.274	0.0474		0.0396	0.234	0.179	5.11			C03
101307SOMF-2-0-C(5)	195906011	695971	1201446581	SAMPLE	Radium-226	0.900	0.145		0.0883	0.812	0.610	5.93			C03
101307SOMF-2-0-C(5)	195906011	695971	1201446581	SAMPLE	Radium-228	1.15	0.255		0.156	0.994	0.640	4.38			C03
101307SOMA-1-0-C(5)	195906012	695971	1201446581	SAMPLE	Cesium-137	0.00	0.0931	UI	0.0767	-0.077	-0.186	0.02		UJ	Q02,C03
101307SOMA-1-0-C(5)	195906012	695971	1201446581	SAMPLE	Radium-226	0.877	0.183		0.126	0.751	0.511	4.72			C03
101307SOMA-1-0-C(5)	195906012	695971	1201446581	SAMPLE	Radium-228	1.48	0.359		0.237	1.243	0.762	4.11			C03
101307SOMBACK-3-0-C(5)	195906013	695971	1201446581	SAMPLE	Cesium-137	0.170	0.0571		0.0756	0.094	0.056	2.71			C03
101307SOMBACK-3-0-C(5)	195906013	695971	1201446581	SAMPLE	Radium-226	1.00	0.183		0.114	0.886	0.634	5.36			C03
101307SOMBACK-3-0-C(5)	195906013	695971	1201446581	SAMPLE	Radium-228	1.21	0.322		0.247	0.963	0.566	3.75			C03
101207SOMS3-38-0-C(5)	195906014	695971	1201446581	SAMPLE	Cesium-137	0.222	0.0625		0.0559	0.166	0.097	3.29			C03
101207SOMS3-38-0-C(5)	195906014	695971	1201446581	SAMPLE	Radium-226	1.41	0.207		0.108	1.302	0.996	6.69			C03
101207SOMS3-38-0-C(5)	195906014	695971	1201446581	SAMPLE	Radium-228	1.35	0.313		0.218	1.132	0.724	4.26			C03
101207SOMS2-04-0-C(5)	195906015	695971	1201446581	SAMPLE	Cesium-137	0.425	0.114		0.0952	0.330	0.197	3.63			C03
101207SOMS2-04-0-C(5)	195906015	695971	1201446581	SAMPLE	Radium-226	1.38	0.275		0.153	1.227	0.830	5.02			C03
101207SOMS2-04-0-C(5)	195906015	695971	1201446581	SAMPLE	Radium-228	1.21	0.365		0.292	0.918	0.480	3.34			C03
101307SOMG-1-0-C(5)	195906016	695971	1201446581	SAMPLE	Cesium-137	0.547	0.102		0.0727	0.474	0.343	5.20			C03
101307SOMG-1-0-C(5)	195906016	695971	1201446581	SAMPLE	Radium-226	0.987	0.216		0.146	0.841	0.555	4.55			C03
101307SOMG-1-0-C(5)	195906016	695971	1201446581	SAMPLE	Radium-228	1.72	0.397		0.237	1.483	0.926	4.33			C03
101307SOMBACK-1-0-C(5)	195906017	695971	1201446581	SAMPLE	Cesium-137	0.207	0.0563		0.0413	0.166	0.094	3.35			C03
101307SOMBACK-1-0-C(5)	195906017	695971	1201446581	SAMPLE	Radium-226	1.17	0.176		0.101	1.069	0.818	6.46			C03
101307SOMBACK-1-0-C(5)	195906017	695971	1201446581	SAMPLE	Radium-228	1.21	0.291		0.165	1.045	0.628	4.10			C03

ATTACHMENT B: DATA VALIDATION_WORKSHEET

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation				
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual
101307SOMA-2-0-C(5)	195906018	695972	1201446584	SAMPLE	Cesium-137	0.158	0.0931		0.0664	0.092	-0.028	1.65	UJ	Q09,B01,C03
101307SOMA-2-0-C(5)	195906018	695972	1201446584	SAMPLE	Radium-226	1.00	0.176		0.126	0.874	0.648	5.43		C03
101307SOMA-2-0-C(5)	195906018	695972	1201446584	SAMPLE	Radium-228	1.27	0.289		0.280	0.990	0.692	4.17		C03
101207SOMS3-40-0-C(5)	195906019	695972	1201446584	SAMPLE	Cesium-137	2.20	0.273		0.107	2.093	1.654	8.04		C03
101207SOMS3-40-0-C(5)	195906019	695972	1201446584	SAMPLE	Radium-226	2.26	0.349		0.189	2.071	1.562	6.38		C03
101207SOMS3-40-0-C(5)	195906019	695972	1201446584	SAMPLE	Radium-228	1.68	0.465		0.355	1.325	0.750	3.50		C03
101307SOMBACK-2-0-C(5)	195906020	695972	1201446584	SAMPLE	Cesium-137	0.201	0.0683		0.0622	0.139	0.064	2.82		C03
101307SOMBACK-2-0-C(5)	195906020	695972	1201446584	SAMPLE	Radium-226	1.09	0.175		0.106	0.984	0.740	5.96		C03
101307SOMBACK-2-0-C(5)	195906020	695972	1201446584	SAMPLE	Radium-228	1.12	0.277		0.209	0.911	0.566	3.82		C03
101207SOMS3-95-0-C(5)	195906021	695972	1201446584	SAMPLE	Cesium-137	2.05	0.221		0.0985	1.952	1.608	9.24		C03
101207SOMS3-95-0-C(5)	195906021	695972	1201446584	SAMPLE	Radium-226	2.56	0.335		0.167	2.393	1.890	7.53		C03
101207SOMS3-95-0-C(5)	195906021	695972	1201446584	SAMPLE	Radium-228	1.42	0.387		0.326	1.094	0.646	3.53		C03
101207SOMS3-33-0-C(5)	195906022	695972	1201446584	SAMPLE	Cesium-137	-0.0117	0.0341	U	0.0548	-0.067	-0.080	0.34		C03
101207SOMS3-33-0-C(5)	195906022	695972	1201446584	SAMPLE	Radium-226	0.785	0.144		0.100	0.685	0.497	5.12		C03
101207SOMS3-33-0-C(5)	195906022	695972	1201446584	SAMPLE	Radium-228	0.699	0.258		0.183	0.516	0.183	2.50	J	B01,C03
101207SOMS3-35-0-C(5)	195906023	695972	1201446584	SAMPLE	Cesium-137	0.285	0.0665		0.0513	0.234	0.152	4.11		C03
101207SOMS3-35-0-C(5)	195906023	695972	1201446584	SAMPLE	Radium-226	0.967	0.158		0.0962	0.871	0.651	5.81		C03
101207SOMS3-35-0-C(5)	195906023	695972	1201446584	SAMPLE	Radium-228	1.15	0.255		0.147	1.003	0.640	4.24		C03
101207SOMS3-107-0-C(5)	195906024	695972	1201446584	SAMPLE	Cesium-137	0.157	0.0799		0.0846	0.072	-0.003	1.90	UJ	Q09,B01,C03
101207SOMS3-107-0-C(5)	195906024	695972	1201446584	SAMPLE	Radium-226	0.731	0.209		0.144	0.587	0.313	3.35		C03
101207SOMS3-107-0-C(5)	195906024	695972	1201446584	SAMPLE	Radium-228	0.210	0.271	U	0.224	-0.014	-0.332	0.63		C03
101207SOMS3-29-0-C(5)	195906026	695972	1201446584	SAMPLE	Cesium-137	-0.000163	0.0257	U	0.0435	-0.044	-0.052	0.05	0.26	C03
101207SOMS3-29-0-C(5)	195906026	695972	1201446584	SAMPLE	Radium-226	1.08	0.150		0.0736	1.006	0.780	6.82	0.04	C03
101207SOMS3-29-0-C(5)	195906026	695972	1201446584	SAMPLE	Radium-228	1.00	0.266		0.145	0.855	0.468	3.53	0.07	C03
101207SOMS3-96-0-C(5)	195906027	695972	1201446584	SAMPLE	Cesium-137	0.310	0.0632		0.053	0.257	0.184	4.69		C03
101207SOMS3-96-0-C(5)	195906027	695972	1201446584	SAMPLE	Radium-226	0.802	0.164		0.0977	0.704	0.474	4.63		C03
101207SOMS3-96-0-C(5)	195906027	695972	1201446584	SAMPLE	Radium-228	0.984	0.250		0.202	0.782	0.484	3.68		C03
101207SOML1-06-0-C(5)	195906028	695972	1201446584	SAMPLE	Cesium-137	0.358	0.0862		0.0865	0.272	0.186	4.05		C03
101207SOML1-06-0-C(5)	195906028	695972	1201446584	SAMPLE	Radium-226	1.32	0.206		0.126	1.194	0.908	6.19		C03
101207SOML1-06-0-C(5)	195906028	695972	1201446584	SAMPLE	Radium-228	1.42	0.366		0.249	1.171	0.688	3.73		C03
101307SOMS3-94-0-C(5)	195906029	695972	1201446584	SAMPLE	Cesium-137	0.769	0.114		0.0656	0.703	0.541	6.65		C03
101307SOMS3-94-0-C(5)	195906029	695972	1201446584	SAMPLE	Radium-226	2.36	0.274		0.116	2.244	1.812	8.45		C03
101307SOMS3-94-0-C(5)	195906029	695972	1201446584	SAMPLE	Radium-228	0.984	0.276		0.212	0.772	0.432	3.35		C03
101307SOMS3-66-0-C(5)	195906030	695972	1201446584	SAMPLE	Cesium-137	0.184	0.0722		0.0781	0.106	0.040	2.45	J	B01,C03
101307SOMS3-66-0-C(5)	195906030	695972	1201446584	SAMPLE	Radium-226	1.67	0.228		0.117	1.553	1.214	7.13		C03
101307SOMS3-66-0-C(5)	195906030	695972	1201446584	SAMPLE	Radium-228	1.27	0.349		0.234	1.036	0.572	3.48		C03
MB	1201446581	695971	1201446581	MB	Cesium-137	0.0016	0.0243	U	0.0423					
MB	1201446581	695971	1201446581	MB	Radium-226	-0.0364	0.0625	U	0.101					
MB	1201446581	695971	1201446581	MB	Radium-228	-0.0635	0.109	U	0.170					
101207SOMS3-27-0-C(5)	1201446582	695971	1201446581	DUP	Cesium-137	0.274	0.0657		0.079					
101207SOMS3-27-0-C(5)	1201446582	695971	1201446581	DUP	Radium-226	1.25	0.207		0.124					
101207SOMS3-27-0-C(5)	1201446582	695971	1201446581	DUP	Radium-228	1.08	0.382		0.280					
MB	1201446584	695972	1201446584	MB	Cesium-137	0.00144	0.0181	U	0.0308					
MB	1201446584	695972	1201446584	MB	Radium-226	0.0181	0.0416	U	0.069					
MB	1201446584	695972	1201446584	MB	Radium-228	0.0358	0.063	U	0.118					

ATTACHMENT B: DATA VALIDATION_WORKSHEET

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation				
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual
101207SOMS3-29-0-C(5)	1201446585	695972	1201446584	DUP	Cesium-137	-0.0217	0.0326	U	0.0518					
101207SOMS3-29-0-C(5)	1201446585	695972	1201446584	DUP	Radium-226	1.10	0.190		0.0947					
101207SOMS3-29-0-C(5)	1201446585	695972	1201446584	DUP	Radium-228	1.05	0.275		0.164					

Dupl RPD= Cesium-137 -20
Radium-226 -13
Radium-228 15

Dupl RPD= Cesium-137 NDs
Radium-226 -1.8
Radium-228 -4.9

MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 195907

Analytical Batches: 695971 and 695972

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method)

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	100907SOMS-15-B-U	10/09/07	195907001
2	100907SOMS-15-EQ-U	10/09/07	195907002
3	100907SOMS2-06-B-U	10/09/07	195907003
4	100907SOMS2-06-EQ-U	10/09/07	195907004
5	101007SOMS2-11-B-U	10/10/07	195907005
6	101007SOMS2-11-EQ-U	10/10/07	195907006
7	101207SOMS2-35-B-U	10/12/07	195907007
8	101207SOMS2-35-EQ-U	10/12/07	195907008
9	101307SOMS3-09-B-U	10/13/07	195907009
10	101307SOMS3-09-EQ-U	10/13/07	195907010
11	101307SOMS3-12-B-U	10/13/07	195907011
12	101307SOMS3-12-EQ-U	10/13/07	195907012
13	1012207SOM3-47-B-U	10/12/07	195907013
14	1012207SOM3-47-EQ-U	10/12/07	195907014
15	101307SOMS3-79-B-U	10/13/07	195907015
16	101307SOMS3-79-EQ-U	10/13/07	195907016
17	101107SOMS3-82-B-U	10/11/07	195907017
18	101107SOMS3-82-EQ-U	10/11/07	195907018
19	101207SOMS3-89-B-U	10/12/07	195907019
20	101207SOMS3-89-EQ-U	10/12/07	195907020
21	100907SOMS3-99-B-U	10/09/07	195907021
22	100907SOMS3-99-EQ-U	10/09/07	195907022
23	101307SOMS3-112-B-U	10/13/07	195907023
24	101307SOMS3-112-EQ-U	10/13/07	195907024
25	101307SOMS3-119-B-U	10/13/07	195907025
26	101307SOMS3-119-EQ-U	10/13/07	195907026
27	101107SOMS4-16-B-U	10/11/07	195907027
28	101107SOMS4-16-EQ-U	10/11/07	195907028
29	101007SOMB-3-B-U	10/10/07	195907029
30	101007SOMB-3-EQ-U	10/10/07	195907030
31	101007SOMD-2-B-U	10/10/07	195907031
32	101007SOMD-2-EQ-U	10/10/07	195907032
33	101507SOMKMBACK-5-B-U	10/15/07	195907033
34	101507SOMKMBACK-5-EQ-U	10/15/07	195907034

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

Signatures on chain(s) and all samples accounted for

²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ²²⁶Ra and ¹³⁷Cs. These field blanks were collected along with all the soil and sediment samples collected during this week, shipped in 11 coolers, and arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact.

The 34 blanks samples were prepared and analyzed between November 2 and 6, 21 to 26 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

- ____ Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples
- ____ Confirm matrix used in geometry standard
- ____ Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- ____ Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- ____ Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+/- limits
- ____ Resolution demonstration of relevant peak(s)
- ____ Listing of X/Y coordinates in constructing the control charts
- ____ Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- ____ Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
- Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results were less than the MDC and two times the uncertainty, and were reported by the laboratory as not detected (U).

The laboratory qualified the following samples as footnoted:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/L)/Lab Flag	Data Validation Flag	Reason Code
100907SOMS2-06-EQ-U	195907004	^{226}Ra	0.00 UI	UJ	Q02
101007SOMS2-11-B-U	195907005	^{226}Ra	0.00 UI	UJ	Q02
101207SOMS3-89-EQ-U	195907020	^{226}Ra	0.00 UI	UJ	Q02

^a Data rejected due to a high counting uncertainty.

^b Data rejected due to no valid peak.

“Data rejected due to a high counting uncertainty” and “Data rejected due to no valid peak” are interpreted to be that there was positive interference at the target frequency that did not meet the qualitative criteria for the target isotope, so the observed result is treated as not detected (UJ).

V. Blanks

- Method blank results < MDC
- ____ Calculate normalized absolute difference (NAD) = $|(\text{Sample} - \text{Blank})| / (\sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2]})$
- ____ If normalized absolute difference is > 2.58, no action necessary

- ____ If normalized absolute difference is between 1.96 and 2.58, qualify sample J
 ____ If normalized absolute difference is less than 1.96, consider rejecting data

All sample results and method blank results were not detected, so calculation of NADs was not applicable.

VI. Laboratory Duplicates

- Must be analyzed for each batch or for every 20 samples
 ____ RPDs within the laboratory's control limits (RPD not calculated when one or both duplicate results are not detected)
 ____ Calculate the duplicate error ratio (DER)) =

$$|(\text{Sample} - \text{Duplicate})| / (2 * (\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2)^{1/2}))$$

$$\text{DER} \leq 1.42$$

 ____ If DER > 1.42, qualify sample J

Laboratory duplicate results were not detected, so RPDs and DERs were not calculated.

VII. Laboratory Control Samples

- Must be analyzed for each batch or for every 20 samples
 Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/L)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
100907SOMS2-06-EQ-U	195907004	^{226}Ra	0.00 UI	UJ	Q02
101007SOMS2-11-B-U	195907005	^{226}Ra	0.00 UI	UJ	Q02
101207SOMS3-89-EQ-U	195907020	^{226}Ra	0.00 UI	UJ	Q02

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency
L04	LCS not the same matrix as the analytical samples

Reason Code	Definition
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Coll_date	Rec_date	Ext_date	Anal_date	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation				
														Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual
100907SOMS-15-B-U	195907001	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Americium-241	1.72	7.95	U	11.7	-9.980	-14.180	-- NA - All results ND --		C03
100907SOMS-15-B-U	195907001	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Cesium-137	1.64	1.81	U	3.24	-1.600	-1.980			C03
100907SOMS-15-B-U	195907001	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Cobalt-60	0.239	1.79	U	3.09	-2.851	-3.341			C03
100907SOMS-15-B-U	195907001	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Radium-226	29.3	80.4	U	63.3	-34.000	-131.500			C03
100907SOMS-15-EQ-U	195907002	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Americium-241	-31	16.1	U	25.4	-56.400	-63.200			C03
100907SOMS-15-EQ-U	195907002	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Cesium-137	-0.141	3.05	U	5.03	-5.171	-6.241			C03
100907SOMS-15-EQ-U	195907002	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Cobalt-60	0.430	3.22	U	5.46	-5.030	-6.010			C03
100907SOMS-15-EQ-U	195907002	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/02/07	11/02/07	Radium-226	89.6	140	U	97.4	-7.800	-190.400			C03
100907SOMS2-06-B-U	195907003	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Americium-241	13.7	12.4	U	18.2	-4.500	-11.100			C03
100907SOMS2-06-B-U	195907003	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Cesium-137	2.81	2.28	U	3.96	-1.150	-1.750			C03
100907SOMS2-06-B-U	195907003	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Cobalt-60	-0.334	2.15	U	3.56	-3.894	-4.634			C03
100907SOMS2-06-B-U	195907003	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Radium-226	28.1	91.2	U	71.3	-43.200	-154.300			C03
100907SOMS2-06-EQ-U	195907004	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Americium-241	8.66	13.9	U	21.3	-12.640	-19.140			C03
100907SOMS2-06-EQ-U	195907004	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Cesium-137	-0.62	1.93	U	3.18	-3.800	-4.480			C03
100907SOMS2-06-EQ-U	195907004	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Cobalt-60	0.0578	2.25	U	3.35	-3.292	-4.442			C03
100907SOMS2-06-EQ-U	195907004	695071	1201444430	SAMPLE	10/09/07	10/17/07	11/03/07	11/03/07	Radium-226	0.00	169	UI	66.6	-66.600	-338.000			UJ
101007SOMS2-11-B-U	195907005	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Americium-241	8.39	11.1	U	17.5	-9.110	-13.810			C03
101007SOMS2-11-B-U	195907005	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Cesium-137	-0.495	2.01	U	3.38	-3.875	-4.515			C03
101007SOMS2-11-B-U	195907005	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Cobalt-60	-0.0718	2.62	U	3.77	-3.842	-5.312			C03
101007SOMS2-11-B-U	195907005	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Radium-226	0.00	153	UI	69.6	-69.600	-306.000			UJ
101007SOMS2-11-EQ-U	195907006	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Americium-241	0.621	3.08	U	4.87	-4.249	-5.539			C03
101007SOMS2-11-EQ-U	195907006	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Cesium-137	-1.44	3.52	U	4.16	-5.600	-8.480			C03
101007SOMS2-11-EQ-U	195907006	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Cobalt-60	0.713	3.07	U	4.45	-3.737	-5.427			C03
101007SOMS2-11-EQ-U	195907006	695071	1201444430	SAMPLE	10/10/07	10/17/07	11/03/07	11/03/07	Radium-226	11.6	76.4	U	56.1	-44.500	-141.200			C03
101207SOMS2-35-B-U	195907007	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Americium-241	7.06	13.3	U	21.5	-14.440	-19.540			C03
101207SOMS2-35-B-U	195907007	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Cesium-137	1.27	1.99	U	3.58	-2.310	-2.710			C03
101207SOMS2-35-B-U	195907007	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Cobalt-60	-1.45	2.18	U	3.29	-4.740	-5.810			C03
101207SOMS2-35-B-U	195907007	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Radium-226	-38.2	76.4	U	115	-153.200	-191.000			C03
101207SOMS2-35-EQ-U	195907008	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Americium-241	5.86	18.9	U	28.9	-23.040	-31.940			C03
101207SOMS2-35-EQ-U	195907008	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Cesium-137	0.593	2.14	U	3.69	-3.097	-3.687			C03
101207SOMS2-35-EQ-U	195907008	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Cobalt-60	1.10	2.12	U	3.81	-2.710	-3.140			C03
101207SOMS2-35-EQ-U	195907008	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Radium-226	75.2	97.3	U	77.1	-1.900	-119.400			C03
101307SOMS3-09-B-U	195907009	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Americium-241	1.16	10.7	U	16.3	-15.140	-20.240			C03

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Coll_date	Rec_date	Ext_date	Anal_date	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
														Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
1012207SOM3-47-EQ-U	195907014	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Cesium-137	0.161	2.09	U	3.47	-3.309	-4.019				C03
1012207SOM3-47-EQ-U	195907014	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Cobalt-60	-2.44	2.11	U	2.83	-5.270	-6.660				C03
1012207SOM3-47-EQ-U	195907014	695071	1201444430	SAMPLE	10/12/07	10/17/07	11/02/07	11/02/07	Radium-226	-47.8	74.9	U	101	-148.800	-197.600				C03
101307SOMS3-79-B-U	195907015	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Americium-241	7.06	8.48	U	13.1	-6.040	-9.900				C03
101307SOMS3-79-B-U	195907015	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Cesium-137	0.603	1.69	U	2.98	-2.377	-2.777				C03
101307SOMS3-79-B-U	195907015	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Cobalt-60	0.719	1.73	U	3.12	-2.401	-2.741				C03
101307SOMS3-79-B-U	195907015	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Radium-226	14.3	69.5	U	64.1	-49.800	-124.700				C03
101307SOMS3-79-EQ-U	195907016	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Americium-241	-21.2	9.45	U	14.4	-35.600	-40.100				C03
101307SOMS3-79-EQ-U	195907016	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Cesium-137	0.123	1.76	U	2.93	-2.807	-3.397				C03
101307SOMS3-79-EQ-U	195907016	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Cobalt-60	-2.45	2.45	U	3.07	-5.520	-7.350				C03
101307SOMS3-79-EQ-U	195907016	695071	1201444430	SAMPLE	10/13/07	10/17/07	11/02/07	11/02/07	Radium-226	5.59	57.2	U	93.6	-88.010	-108.810				C03
101107SOMS3-82-B-U	195907017	695071	1201444430	SAMPLE	10/11/07	10/17/07	11/02/07	11/02/07	Americium-241	1.71	4.20	U	6.76	-5.050	-6.690				C03
101107SOMS3-82-B-U	195907017	695071	1201444430	SAMPLE	10/11/07	10/17/07	11/02/07	11/02/07	Cesium-137	0.818	2.97	U	4.63	-3.812	-5.122				C03
101107SOMS3-82-B-U	195907017	695071	1201444430	SAMPLE	10/11/07	10/17/07	11/02/07	11/02/07	Cobalt-60	2.39	2.98	U	5.17	-2.780	-3.570				C03
101107SOMS3-82-B-U	195907017	695071	1201444430	SAMPLE	10/11/07	10/17/07	11/02/07	11/02/07	Radium-226	-2.72	58.3	U	100	-102.720	-119.320				C03
101107SOMS3-82-EQ-U	195907018	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Americium-241	2.96	13.2	U	17.8	-14.840	-23.440				C03
101107SOMS3-82-EQ-U	195907018	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Cesium-137	1.17	2.09	U	3.20	-2.030	-3.010				C03
101107SOMS3-82-EQ-U	195907018	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Cobalt-60	0.0704	1.69	U	2.90	-2.830	-3.310				C03
101107SOMS3-82-EQ-U	195907018	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Radium-226	8.84	78.4	U	72.5	-63.660	-147.960				C03
101207SOMS3-89-B-U	195907019	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Americium-241	-2.59	8.53	U	14.7	-17.290	-19.650				C03
101207SOMS3-89-B-U	195907019	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Cesium-137	-0.0627	1.39	U	2.35	-2.413	-2.843				C03
101207SOMS3-89-B-U	195907019	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Cobalt-60	-0.226	1.36	U	2.23	-2.456	-2.946				C03
101207SOMS3-89-B-U	195907019	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Radium-226	-31.1	57.2	U	79.5	-110.600	-145.500				C03
101207SOMS3-89-EQ-U	195907020	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Americium-241	1.72	11.4	U	14.9	-13.180	-21.080				C03
101207SOMS3-89-EQ-U	195907020	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Cesium-137	0.202	1.49	U	2.48	-2.278	-2.778				C03
101207SOMS3-89-EQ-U	195907020	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Cobalt-60	1.19	1.75	U	2.77	-1.580	-2.310				C03
101207SOMS3-89-EQ-U	195907020	695072	1201444434	SAMPLE	10/12/07	10/17/07	11/05/07	11/05/07	Radium-226	0.00	95.4	UI	56.0	-56.000	-190.800				UJ Q2,C03
100907SOMS3-99-B-U	195907021	695072	1201444434	SAMPLE	10/09/07	10/17/07	11/05/07	11/05/07	Americium-241	21.8	24.0	U	32.9	-11.100	-26.200				C03
100907SOMS3-99-B-U	195907021	695072	1201444434	SAMPLE	10/09/07	10/17/07	11/05/07	11/05/07	Cesium-137	-1.11	2.63	U	4.26	-5.370	-6.370				C03
100907SOMS3-99-B-U	195907021	695072	1201444434	SAMPLE	10/09/07	10/17/07	11/05/07	11/05/07	Cobalt-60	-1.02	2.85	U	4.52	-5.540	-6.720				C03
100907SOMS3-99-B-U	195907021	695072	1201444434	SAMPLE	10/09/07	10/17/07	11/05/07	11/05/07	Radium-226	-80.3	114	U	119	-199.300	-308.300				C03
100907SOMS3-99-EQ-U	195907022	695072	1201444434	SAMPLE	10/09/07	10/17/07	11/05/07	11/05/07	Americium-241	-1.97	16.1	U	24.6	-26.570	-34.170				C03
100907SOMS3-99-EQ-U	195907022	695072	1201444434	SAMPLE	10/09/07	10/17/07	11/05/07	11/05/07</td											

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Coll_date	Rec_date	Ext_date	Anal_date	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
														Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101107SOMS4-16-B-U	195907027	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/06/07	11/06/07	Cobalt-60	1.98	2.23	U	4.06	-2.080	-2.480				C03
101107SOMS4-16-B-U	195907027	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/06/07	11/06/07	Radium-226	-44.8	75.2	U	115	-159.800	-195.200				C03
101107SOMS4-16-EQ-U	195907028	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Americium-241	-8.29	9.59	U	15.1	-23.390	-27.470				C03
101107SOMS4-16-EQ-U	195907028	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Cesium-137	0.711	2.86	U	2.64	-1.929	-5.009				C03
101107SOMS4-16-EQ-U	195907028	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Cobalt-60	-0.0804	1.61	U	2.71	-2.790	-3.300				C03
101107SOMS4-16-EQ-U	195907028	695072	1201444434	SAMPLE	10/11/07	10/17/07	11/05/07	11/05/07	Radium-226	0.0302	73.7	U	66.5	-66.470	-147.370				C03
101007SOMB-3-B-U	195907029	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Americium-241	-1.53	11.5	U	16.7	-18.230	-24.530				C03
101007SOMB-3-B-U	195907029	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cesium-137	-1.8	2.72	U	4.28	-6.080	-7.240				C03
101007SOMB-3-B-U	195907029	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cobalt-60	-0.00323	2.88	U	4.81	-4.813	-5.763				C03
101007SOMB-3-B-U	195907029	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Radium-226	-4.4	79.3	U	108	-112.400	-163.000				C03
101007SOMB-3-EQ-U	195907030	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Americium-241	-4.54	12.1	U	16.0	-20.540	-28.740				C03
101007SOMB-3-EQ-U	195907030	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cesium-137	0.265	2.90	U	4.18	-3.915	-5.535				C03
101007SOMB-3-EQ-U	195907030	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cobalt-60	-2.83	4.09	U	4.73	-7.560	-11.010				C03
101007SOMB-3-EQ-U	195907030	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Radium-226	-36.1	79.3	U	105	-141.100	-194.700				C03
101007SOMD-2-B-U	195907031	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Americium-241	-2.67	11.3	U	16.9	-19.570	-25.270				C03
101007SOMD-2-B-U	195907031	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cesium-137	-1.87	2.56	U	4.07	-5.940	-6.990				C03
101007SOMD-2-B-U	195907031	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cobalt-60	1.42	2.51	U	4.49	-3.070	-3.600				C03
101007SOMD-2-B-U	195907031	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Radium-226	63.6	113	U	79.8	-16.200	-162.400				C03
101007SOMD-2-EQ-U	195907032	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Americium-241	7.64	9.19	U	14.0	-6.360	-10.740				C03
101007SOMD-2-EQ-U	195907032	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cesium-137	-1.19	2.51	U	3.53	-4.720	-6.210				C03
101007SOMD-2-EQ-U	195907032	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Cobalt-60	-1.34	2.16	U	3.44	-4.780	-5.660				C03
101007SOMD-2-EQ-U	195907032	695072	1201444434	SAMPLE	10/10/07	10/17/07	11/05/07	11/05/07	Radium-226	33.2	101	U	79.5	-46.300	-168.800				C03
101507SOMKMBACK-5-B-U	195907033	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Americium-241	7.32	19.2	U	22.2	-14.880	-31.080				C03
101507SOMKMBACK-5-B-U	195907033	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Cesium-137	0.760	2.30	U	3.92	-3.160	-3.840				C03
101507SOMKMBACK-5-B-U	195907033	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Cobalt-60	0.0272	2.12	U	3.56	-3.533	-4.213				C03
101507SOMKMBACK-5-B-U	195907033	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Radium-226	60.5	109	U	85.6	-25.100	-157.500				C03
101507SOMKMBACK-5-EQ-U	195907034	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Americium-241	-4.72	19.4	U	28.3	-33.020	-43.520				C03
101507SOMKMBACK-5-EQ-U	195907034	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Cesium-137	-1.53	2.34	U	3.20	-4.730	-6.210				C03
101507SOMKMBACK-5-EQ-U	195907034	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Cobalt-60	-1.6	1.99	U	2.78	-4.380	-5.580				C03
101507SOMKMBACK-5-EQ-U	195907034	695072	1201444434	SAMPLE	10/15/07	10/17/07	11/06/07	11/06/07	Radium-226	-11.3	71.7	U	107	-118.300	-154.700				C03
MB	1201444430	695071	1201444430	MB	11/03/07	11/03/07	11/03/07	11/03/07	Americium-241	1.93	13.5	U	17.8						
MB	1201444430	695071	1201444430	MB	11/03/07	11/03/07	11/03/07	11/03/07	Cesium-137	1.10	2.33	U	4.02						
MB	1201444430	695071	1201444430	MB	11/03/07	11/03/07	11/03/07	11/03/07	Cobalt-60	2.32	2.20	U	3.85						
MB	1201444430	695071	1201444430</td																

MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 195910

Analytical Batches: 695972, 695973, and 695973

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method)

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	101107SOMS3-110-0-C(5)	10/11/07	195910002
2	101107SOMS3-86-0-C(5)	10/11/07	195910003
3	101107SOMS4-13-0-C(5)	10/11/07	195910005
4	101107SOMS4-11-0-C(5)	10/11/07	195910006
5	101007SOME-1-0-C(5)	10/11/07	195910007
6	101007SOMD-1-0-C(5)	10/11/07	195910008
7	101007SOMS4-9-0-C(5)	10/11/07	195910009
8	101107SOMS3-84-0-C(5)	10/11/07	195910010
9	101107SOMS4-5-0-C(5)	10/11/07	195910011
10	101107SOMS3-120-0-C(5)	10/11/07	195910012
11	101107SOMS-01-0-C(5)	10/11/07	195910013
12	101007SOMS4-12-0-C(5)	10/10/07	195910014
13	101107SOMS-04-0-C(5)	10/11/07	195910015
14	101107SOMS2-16-0-C(5)	10/11/07	195910016
15	101007SOMS4-8-0-C(5)	10/10/07	195910017
16	101007SOMS3-05-C(5)	10/11/07	195910018
17	101107SOMS3-117-0-C(5)	10/11/07	195910019
18	101107SOMS3-10-0-C(5)	10/11/07	195910020
19	100907SOMS3-70-0-C(5)	10/09/07	195910022
20	100907SOMS3-65-0-C(5)	10/09/07	195910023
21	101107SOMS4-14-0-C(5)	10/11/07	195910024
22	101107SOMS2-28-0-C(5)	10/11/07	195910025
23	101107SOMS4-17-0-C(5)	10/11/07	195910026
24	101107SOMS3-03-0-C(5)	10/11/07	195910027
25	101107SOMS2-9-0-C(5)	10/11/07	195910028
26	101007SOMS4-2-0-C(5)	10/10/07	195910029
27	101107SOMS3-85-0-C(5)	10/11/07	195910030
28	101107SOMS4-19-0-C(5)	10/11/07	195910031
29	1011107SOMS3-57-0-C(5)	10/11/07	195910032
30	101107SOMS2-27-0-C(5)	10/11/07	195910033
31	100907SOMS2-8-0-C(5)	10/09/07	195910034
32	101107SOMS4-7-0-C(5)	10/11/07	195910035
33	100907SOMS-12-0-C(5)	10/09/07	195910037
34	100907SOMS3-18-0-C(5)	10/09/07	195910038
35	100907SOMS-13-0-C(5)	10/09/07	195910039
36	100907SOMS3-20-0-C(5)	10/09/07	195910040
37	100907SOMS-16-0-C(5)	10/09/07	195910041

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

X Signatures on chain(s) and all samples accounted for
X ²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 37 soil samples were collected between October 9 and 11, 2007 in HDPE containers. All samples collected during this week were shipped in 11 coolers, and

arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact. The 37 primary samples were prepared on October 22, 2007 and analyzed between October 31 and November 5, 2007, 20 to 27 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

- Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples
- Confirm matrix used in geometry standard
- Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+- limits
- Resolution demonstration of relevant peak(s)
- Listing of X/Y coordinates in constructing the control charts
- Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
- Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
- Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results that were either less than two times the uncertainty were reported by the laboratory as not detected (U), or were greater than two times the uncertainty and greater than the minimum detectable concentration (MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result Minus 2*Uncert	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS-01-0-C(5)	195910013	²²⁸ Ra	-0.014	0.896	UJ	Q09
101107SOMS-04-0-C(5)	195910015	²²⁸ Ra	-0.175	0.913	UJ	Q09
101107SOMS4-19-0-C(5)	195910031	²²⁸ Ra	-0.154	0.536	UJ	Q09

Results were flagged as not detected (UJ) at the reported concentrations because they failed both the above “two times uncertainty” criterion and the blank criterion specified in Section V below.

Additionally, the laboratory qualified the following sample as footnoted:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS4-13-0-C(5)	195910005	^{137}Cs	0.00 UI	R	P03
101007SOMD-1-0-C(5)	195910008	^{137}Cs	0.00 UI	UJ	Q02
101107SOMS3-84-0-C(5)	195910010	^{137}Cs	0.00 UI	UJ	Q02
101107SOMS3-10-0-C(5)	195910020	^{228}Ra	0.00 UI	UJ	Q02
100907SOMS-12-0-C(5)	195910037	^{137}Cs	0.00 UI	UJ	Q02
100907SOMS3-18-0-C(5)	195910038	^{137}Cs	0.00 UI	UJ	Q02
100907SOMS-13-0-C(5)	195910039	^{137}Cs	0.00 UI	UJ	Q02

a Data rejected due to high peak-width.

b Data rejected due to no valid peak.

c Data rejected due to low abundance.

“Data rejected due to high peak-width” is interpreted to be a loss of resolution for the detected peak, so is considered rejected (R). “Data rejected due to no valid peak” and “Data rejected due to low abundance” are interpreted to be that there was positive interference at the target frequency that did not meet the qualitative criteria for the target isotope, so the observed result is treated as not detected (UJ).

V. Blanks

Method blank results < MDC

Calculate normalized absolute difference (NAD) = $|(\text{Sample} - \text{Blank})| / (\sqrt{[\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2]})$

If normalized absolute difference is > 2.58, no action necessary

If normalized absolute difference is between 1.96 and 2.58, qualify sample J

If normalized absolute difference is less than 1.96, consider rejecting data

All normalized absolute differences (per above calculation) were greater than 2.58 for all sample results that were reportable (that is, reported as a detection above the MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS3-110-0-C(5)	195910002	^{228}Ra	2.36	0.854	J	B01
101007SOME-1-0-C(5)	195910007	^{137}Cs	2.57	0.275	J	B01
101007SOMS4-9-0-C(5)	195910009	^{137}Cs	1.28	0.168	J	B01
101107SOMS4-5-0-C(5)	195910011	^{137}Cs	1.38	0.156	J	B01
101107SOMS3-120-0-C(5)	195910012	^{137}Cs	1.54	0.176	J	B01
101107SOMS-01-0-C(5)	195910013	^{228}Ra	1.87	0.896	J	B01
101007SOMS4-12-0-C(5)	195910014	^{137}Cs	2.32	0.254	J	B01
101107SOMS-04-0-C(5)	195910015	^{228}Ra	1.60	0.913	J	B01
101007SOMS4-8-0-C(5)	195910017	^{137}Cs	1.51	0.220	J	B01
101007SOMS3-05-C(5)	195910018	^{137}Cs	2.03	0.227	J	B01
101107SOMS3-117-0-C(5)	195910019	^{137}Cs	2.46	0.260	J	B01
100907SOMS3-70-0-C(5)	195910022	^{137}Cs	2.07	0.236	J	B01
100907SOMS3-65-0-C(5)	195910023	^{137}Cs	1.76	0.219	J	B01
101107SOMS4-14-0-C(5)	195910024	^{228}Ra	2.26	0.823	J	B01
101107SOMS2-28-0-C(5)	195910025	^{137}Cs	2.14	0.237	J	B01

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS4-17-0-C(5)	195910026	^{228}Ra	2.31	0.583	J	B01
101107SOMS2-9-0-C(5)	195910028	^{228}Ra	2.13	0.975	J	B01
101007SOMS4-2-0-C(5)	195910029	^{137}Cs	1.12	0.127	J	B01
101107SOMS4-19-0-C(5)	195910031	^{228}Ra	1.43	0.536	J	B01
1011107SOMS3-57-0-C(5)	195910032	^{137}Cs	2.42	0.265	J	B01
100907SOMS2-8-0-C(5)	195910034	^{228}Ra	2.54	0.934	J	B01
101107SOMS4-7-0-C(5)	195910035	^{137}Cs	1.69	0.199	J	B01
100907SOMS3-20-0-C(5)	195910040	^{137}Cs	1.35	0.173	J	B01
100907SOMS3-20-0-C(5)	195910040	^{228}Ra	2.25	1.02	J	B01
100907SOMS-16-0-C(5)	195910041	^{137}Cs	2.13	0.213	J	B01

VI. Laboratory Duplicates

Must be analyzed for each batch or for every 20 samples

RPDs within the laboratory's control limits (RPD not calculated when one or both duplicate results are not detected)

Calculate the duplicate error ratio (DER) =

$$|(\text{Sample} - \text{Duplicate})| / (2 * (\text{[Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2]^{1/2}))$$

$$\text{DER} \leq 1.42$$

If DER > 1.42, qualify sample J

The laboratory's laboratory duplicate criteria are: If duplicate activities are less than 5 times MDC, then the RPD should be less than 100%; if activities are greater than 5 times the MDC, the RPD should be less than 20%.

With the following exception, all RPDs and DERs associated with both laboratory duplicate pairs were within these criteria:

Field Sample Identification	Laboratory Sample Identification	Parameter	RPD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
100907SOMS3-70-0-C(5)	195905022	^{228}Ra	33	1.59	None	None

Although the RPD of 33 for this duplicate pair was greater than the control limit of 20, the DER of 0.53 was within control. The variance does not constitute a significant difference, so neither the primary sample results nor associated samples results were qualified.

VII. Laboratory Control Samples

Must be analyzed for each batch or for every 20 samples

Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Equipment and Water Blank Samples

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ^{226}Ra and ^{137}Cs (see data validation report for GEL SDG 195907). All equipment blanks and water blanks were not detected for both ^{226}Ra and ^{137}Cs .

IX. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
101107SOMS3-110-0-C(5)	195910002	^{228}Ra	0.854	J	B01
101107SOMS4-13-0-C(5)	195910005	^{137}Cs	0.00 UI	R	P03
101007SOME-1-0-C(5)	195910007	^{137}Cs	0.275	J	B01
101007SOMD-1-0-C(5)	195910008	^{137}Cs	0.00 UI	UJ	Q02
101007SOMS4-9-0-C(5)	195910009	^{137}Cs	0.168	J	B01
101107SOMS3-84-0-C(5)	195910010	^{137}Cs	0.00 UI	UJ	Q02
101107SOMS4-5-0-C(5)	195910011	^{137}Cs	0.156	J	B01
101107SOMS3-120-0-C(5)	195910012	^{137}Cs	0.176	J	B01
101107SOMS-01-0-C(5)	195910013	^{228}Ra	0.896	J	Q09,B01
101007SOMS4-12-0-C(5)	195910014	^{137}Cs	0.254	J	B01
101107SOMS-04-0-C(5)	195910015	^{228}Ra	0.913	J	Q09,B01
101007SOMS4-8-0-C(5)	195910017	^{137}Cs	0.220	J	B01
101007SOMS3-05-C(5)	195910018	^{137}Cs	0.227	J	B01
101107SOMS3-117-0-C(5)	195910019	^{137}Cs	0.260	J	B01
101107SOMS3-10-0-C(5)	195910020	^{228}Ra	0.00 UI	UJ	Q02
100907SOMS3-70-0-C(5)	195910022	^{137}Cs	0.236	J	B01
100907SOMS3-65-0-C(5)	195910023	^{137}Cs	0.219	J	B01
101107SOMS4-14-0-C(5)	195910024	^{228}Ra	0.823	J	B01
101107SOMS2-28-0-C(5)	195910025	^{137}Cs	0.237	J	B01
101107SOMS4-17-0-C(5)	195910026	^{228}Ra	0.583	J	B01
101107SOMS2-9-0-C(5)	195910028	^{228}Ra	0.975	J	B01
101007SOMS4-2-0-C(5)	195910029	^{137}Cs	0.127	J	B01
101107SOMS4-19-0-C(5)	195910031	^{228}Ra	0.536	J	Q09,B01
1011107SOMS3-57-0-C(5)	195910032	^{137}Cs	0.265	J	B01
100907SOMS2-8-0-C(5)	195910034	^{228}Ra	0.934	J	B01
101107SOMS4-7-0-C(5)	195910035	^{137}Cs	0.199	J	B01
100907SOMS-12-0-C(5)	195910037	^{137}Cs	0.00 UI	UJ	Q02
100907SOMS3-18-0-C(5)	195910038	^{137}Cs	0.00 UI	UJ	Q02
100907SOMS-13-0-C(5)	195910039	^{137}Cs	0.00 UI	UJ	Q02
100907SOMS3-20-0-C(5)	195910040	^{137}Cs	0.173	J	B01
100907SOMS3-20-0-C(5)	195910040	^{228}Ra	1.02	J	B01
100907SOMS-16-0-C(5)	195910041	^{137}Cs	0.213	J	B01

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency
L04	LCS not the same matrix as the analytical samples

Reason Code	Definition
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation				
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual
101107SOMS3-110-0-C(5)	195910002	695972	1201446584	SAMPLE	Cesium-137	1.07	0.152		0.0836	0.986	0.766	6.98		C03
101107SOMS3-110-0-C(5)	195910002	695972	1201446584	SAMPLE	Radium-226	2.38	0.337		0.153	2.227	1.706	6.96		C03
101107SOMS3-110-0-C(5)	195910002	695972	1201446584	SAMPLE	Radium-228	0.854	0.341		0.266	0.588	0.172	2.36	J	B01,C03
101107SOMS3-86-0-C(5)	195910003	695972	1201446584	SAMPLE	Cesium-137	0.286	0.072		0.0679	0.218	0.142	2.62		C03
101107SOMS3-86-0-C(5)	195910003	695972	1201446584	SAMPLE	Radium-226	1.25	0.187		0.114	1.136	0.876	6.15		C03
101107SOMS3-86-0-C(5)	195910003	695972	1201446584	SAMPLE	Radium-228	1.13	0.283		0.213	0.917	0.564	3.77		C03
101107SOMS4-13-0-C(5)	195910005	695972	1201446584	SAMPLE	Cesium-137	0.00	0.0819	UI	0.0664	-0.066	-0.164	0.35	R	P03,C03
101107SOMS4-13-0-C(5)	195910005	695972	1201446584	SAMPLE	Radium-226	1.22	0.193		0.124	1.096	0.834	5.83		C03
101107SOMS4-13-0-C(5)	195910005	695972	1201446584	SAMPLE	Radium-228	1.40	0.395		0.220	1.180	0.610	3.41		C03
101107SOMS4-11-0-C(5)	195910006	695972	1201446584	SAMPLE	Cesium-137	0.271	0.0634		0.0528	0.218	0.144	2.63		C03
101107SOMS4-11-0-C(5)	195910006	695972	1201446584	SAMPLE	Radium-226	1.22	0.190		0.104	1.116	0.840	5.92		C03
101107SOMS4-11-0-C(5)	195910006	695972	1201446584	SAMPLE	Radium-228	1.08	0.273		0.214	0.866	0.534	3.73		C03
101007SOME-1-0-C(5)	195910007	695972	1201446584	SAMPLE	Cesium-137	0.275	0.0684		0.0655	0.210	0.138	2.57	J	B01,C03
101007SOME-1-0-C(5)	195910007	695972	1201446584	SAMPLE	Radium-226	1.19	0.196		0.110	1.080	0.798	5.61		C03
101007SOME-1-0-C(5)	195910007	695972	1201446584	SAMPLE	Radium-228	1.38	0.343		0.236	1.144	0.694	3.85		C03
101007SOMD-1-0-C(5)	195910008	695972	1201446584	SAMPLE	Cesium-137	0.00	0.098	UI	0.0897	-0.090	-0.196	0.31	UJ	Q02,C03
101007SOMD-1-0-C(5)	195910008	695972	1201446584	SAMPLE	Radium-226	0.949	0.205		0.126	0.823	0.539	4.26		C03
101007SOMD-1-0-C(5)	195910008	695972	1201446584	SAMPLE	Radium-228	1.23	0.363		0.274	0.956	0.504	3.24		C03
101007SOMS4-9-0-C(5)	195910009	695972	1201446584	SAMPLE	Cesium-137	0.168	0.0823		0.0709	0.097	0.003	1.28	J	B01,C03
101007SOMS4-9-0-C(5)	195910009	695972	1201446584	SAMPLE	Radium-226	1.28	0.196		0.121	1.159	0.888	6.04		C03
101007SOMS4-9-0-C(5)	195910009	695972	1201446584	SAMPLE	Radium-228	1.32	0.345		0.197	1.123	0.630	3.66		C03
101107SOMS3-84-0-C(5)	195910010	695972	1201446584	SAMPLE	Cesium-137	0.00	0.0796	UI	0.056	-0.056	-0.159	0.35	UJ	Q02,C03
101107SOMS3-84-0-C(5)	195910010	695972	1201446584	SAMPLE	Radium-226	3.25	0.385		0.149	3.101	2.480	8.24		C03
101107SOMS3-84-0-C(5)	195910010	695972	1201446584	SAMPLE	Radium-228	1.10	0.340		0.298	0.802	0.420	3.08		C03
101107SOMS4-5-0-C(5)	195910011	695973	1201446587	SAMPLE	Cesium-137	0.156	0.0599		0.0657	0.090	0.036	1.38	J	B01,C03
101107SOMS4-5-0-C(5)	195910011	695973	1201446587	SAMPLE	Radium-226	1.25	0.187		0.116	1.134	0.876	6.15		C03
101107SOMS4-5-0-C(5)	195910011	695973	1201446587	SAMPLE	Radium-228	1.09	0.341		0.250	0.840	0.408	3.04		C03
101107SOMS3-120-0-C(5)	195910012	695973	1201446587	SAMPLE	Cesium-137	0.176	0.0661		0.0567	0.119	0.044	1.54	J	B01,C03
101107SOMS3-120-0-C(5)	195910012	695973	1201446587	SAMPLE	Radium-226	1.66	0.229		0.109	1.551	1.202	6.84		C03
101107SOMS3-120-0-C(5)	195910012	695973	1201446587	SAMPLE	Radium-228	1.35	0.307		0.178	1.172	0.736	4.19		C03
101107SOMS-01-0-C(5)	195910013	695973	1201446587	SAMPLE	Cesium-137	0.516	0.104		0.0941	0.422	0.308	3.95		C03
101107SOMS-01-0-C(5)	195910013	695973	1201446587	SAMPLE	Radium-226	10.6	1.10		0.205	10.395	8.400	9.59		C03
101107SOMS-01-0-C(5)	195910013	695973	1201446587	SAMPLE	Radium-228	0.896	0.455		0.392	0.504	-0.014	1.87	UJ	Q09,B01,C03
101007SOMS4-12-0-C(5)	195910014	695973	1201446587	SAMPLE	Cesium-137	0.254	0.0699		0.0779	0.176	0.114	2.32	J	B01,C03
101007SOMS4-12-0-C(5)	195910014	695973	1201446587	SAMPLE	Radium-226	1.57	0.232		0.132	1.438	1.106	6.38		C03
101007SOMS4-12-0-C(5)	195910014	695973	1201446587	SAMPLE	Radium-228	1.36	0.347		0.323	1.037	0.666	3.75		C03
101107SOMS-04-0-C(5)	195910015	695973	1201446587	SAMPLE	Cesium-137	0.653	0.131		0.110	0.543	0.391	4.25		C03
101107SOMS-04-0-C(5)	195910015	695973	1201446587	SAMPLE	Radium-226	4.26	0.525		0.208	4.052	3.210	7.99		C03
101107SOMS-04-0-C(5)	195910015	695973	1201446587	SAMPLE	Radium-228	0.913	0.544		0.443	0.470	-0.175	1.60	UJ	Q09,B01,C03
101107SOMS2-16-0-C(5)	195910016	695973	1201446587	SAMPLE	Cesium-137	0.345	0.0906		0.0709	0.274	0.164	2.80		C03
101107SOMS2-16-0-C(5)	195910016	695973	1201446587	SAMPLE	Radium-226	1.27	0.197		0.135	1.135	0.876	5.97		C03
101107SOMS2-16-0-C(5)	195910016	695973	1201446587	SAMPLE	Radium-228	0.911	0.279		0.237	0.674	0.353	3.06		C03
101007SOMS4-8-0-C(5)	195910017	695973	1201446587	SAMPLE	Cesium-137	0.220	0.104		0.0658	0.154	0.012	1.51	J	B01,C03
101007SOMS4-8-0-C(5)	195910017	695973	1201446587	SAMPLE	Radium-226	1.33	0.218		0.130	1.200	0.894	5.70		C03
101007SOMS4-8-0-C(5)	195910017	695973	1201446587	SAMPLE	Radium-228	1.31	0.351		0.238	1.072	0.608	3.57		C03
101007SOMS3-05-C(5)	195910018	695973	1201446587	SAMPLE	Cesium-137	0.227	0.0703		0.0608	0.166	0.086	2.03	J	B01,C03
101007SOMS3-05-C(5)	195910018	695973	1201446587	SAMPLE	Radium-226	2.28	0.267		0.128	2.152	1.746	8.18		C03

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101107SOMS3-05-C(5)	195910018	695973	1201446587	SAMPLE	Radium-228	1.48	0.339		0.225	1.255	0.802	4.19		C03	
101107SOMS3-117-0-C(5)	195910019	695973	1201446587	SAMPLE	Cesium-137	0.260	0.0659		0.0761	0.184	0.128	2.46	J	B01,C03	
101107SOMS3-117-0-C(5)	195910019	695973	1201446587	SAMPLE	Radium-226	1.79	0.269		0.139	1.651	1.252	6.35		C03	
101107SOMS3-117-0-C(5)	195910019	695973	1201446587	SAMPLE	Radium-228	1.28	0.363		0.287	0.993	0.554	3.38		C03	
101107SOMS3-10-0-C(5)	195910020	695973	1201446587	SAMPLE	Cesium-137	0.642	0.090		0.0652	0.577	0.462	5.52		C03	
101107SOMS3-10-0-C(5)	195910020	695973	1201446587	SAMPLE	Radium-226	2.98	0.333		0.121	2.859	2.314	8.69		C03	
101107SOMS3-10-0-C(5)	195910020	695973	1201446587	SAMPLE	Radium-228	0.00	0.286	UI	0.423	-0.423	-0.572	0.12	UJ	Q02,C03	
100907SOMS3-70-0-C(5)	195910022	695973	1201446587	SAMPLE	Cesium-137	0.236	0.0736		0.0699	0.166	0.089	2.07	0.41	J	B01,C03
100907SOMS3-70-0-C(5)	195910022	695973	1201446587	SAMPLE	Radium-226	1.39	0.233		0.135	1.255	0.924	5.61	0.32	C03	
100907SOMS3-70-0-C(5)	195910022	695973	1201446587	SAMPLE	Radium-228	1.59	0.342		0.239	1.351	0.906	4.47	0.53	J	C03
100907SOMS3-65-0-C(5)	195910023	695973	1201446587	SAMPLE	Cesium-137	0.219	0.083		0.0685	0.151	0.053	1.76		J	B01,C03
100907SOMS3-65-0-C(5)	195910023	695973	1201446587	SAMPLE	Radium-226	1.20	0.199		0.138	1.062	0.802	5.58		C03	
100907SOMS3-65-0-C(5)	195910023	695973	1201446587	SAMPLE	Radium-228	1.20	0.300		0.223	0.977	0.600	3.80		C03	
101107SOMS4-14-0-C(5)	195910024	695973	1201446587	SAMPLE	Cesium-137	1.05	0.126		0.0744	0.976	0.798	7.20		C03	
101107SOMS4-14-0-C(5)	195910024	695973	1201446587	SAMPLE	Radium-226	1.78	0.252		0.123	1.657	1.276	6.71		C03	
101107SOMS4-14-0-C(5)	195910024	695973	1201446587	SAMPLE	Radium-228	0.823	0.343		0.236	0.587	0.137	2.26	J	B01,C03	
101107SOMS2-28-0-C(5)	195910025	695973	1201446587	SAMPLE	Cesium-137	0.237	0.070		0.0622	0.175	0.097	2.14	J	B01,C03	
101107SOMS2-28-0-C(5)	195910025	695973	1201446587	SAMPLE	Radium-226	1.12	0.181		0.122	0.998	0.758	5.66		C03	
101107SOMS2-28-0-C(5)	195910025	695973	1201446587	SAMPLE	Radium-228	1.03	0.303		0.249	0.781	0.424	3.21		C03	
101107SOMS4-17-0-C(5)	195910026	695973	1201446587	SAMPLE	Cesium-137	0.294	0.0721		0.0623	0.232	0.150	2.70		C03	
101107SOMS4-17-0-C(5)	195910026	695973	1201446587	SAMPLE	Radium-226	1.64	0.217		0.116	1.524	1.206	7.10		C03	
101107SOMS4-17-0-C(5)	195910026	695973	1201446587	SAMPLE	Radium-228	0.583	0.228		0.217	0.366	0.127	2.31	J	B01,C03	
101107SOMS3-03-0-C(5)	195910027	695973	1201446587	SAMPLE	Cesium-137	0.365	0.0875		0.0642	0.301	0.190	3.05		C03	
101107SOMS3-03-0-C(5)	195910027	695973	1201446587	SAMPLE	Radium-226	1.98	0.276		0.132	1.848	1.428	6.87		C03	
101107SOMS3-03-0-C(5)	195910027	695973	1201446587	SAMPLE	Radium-228	0.892	0.317		0.259	0.633	0.258	2.65		C03	
101107SOMS2-9-0-C(5)	195910028	695973	1201446587	SAMPLE	Cesium-137	0.476	0.105		0.0847	0.391	0.266	3.59		C03	
101107SOMS2-9-0-C(5)	195910028	695973	1201446587	SAMPLE	Radium-226	2.46	0.362		0.187	2.273	1.736	6.60		C03	
101107SOMS2-9-0-C(5)	195910028	695973	1201446587	SAMPLE	Radium-228	0.975	0.437		0.405	0.570	0.101	2.13	J	B01,C03	
101007SOMS4-2-0-C(5)	195910029	695973	1201446587	SAMPLE	Cesium-137	0.127	0.0514		0.0661	0.061	0.024	1.12	J	B01,C03	
101007SOMS4-2-0-C(5)	195910029	695973	1201446587	SAMPLE	Radium-226	1.22	0.198		0.0995	1.121	0.824	5.70		C03	
101007SOMS4-2-0-C(5)	195910029	695973	1201446587	SAMPLE	Radium-228	1.25	0.321		0.182	1.068	0.608	3.71		C03	
101107SOMS3-85-0-C(5)	195910030	695973	1201446587	SAMPLE	Cesium-137	0.267	0.0537		0.0571	0.210	0.160	2.79		C03	
101107SOMS3-85-0-C(5)	195910030	695973	1201446587	SAMPLE	Radium-226	1.06	0.182		0.102	0.958	0.696	5.32		C03	
101107SOMS3-85-0-C(5)	195910030	695973	1201446587	SAMPLE	Radium-228	1.18	0.287		0.185	0.995	0.606	3.89		C03	
101107SOMS4-19-0-C(5)	195910031	695973	1201446587	SAMPLE	Cesium-137	0.800	0.127		0.0975	0.703	0.546	5.39		C03	
101107SOMS4-19-0-C(5)	195910031	695973	1201446587	SAMPLE	Radium-226	3.43	0.417		0.158	3.272	2.596	8.05		C03	
101107SOMS4-19-0-C(5)	195910031	695973	1201446587	SAMPLE	Radium-228	0.536	0.345		0.294	0.242	-0.154	1.43	UJ	Q09,B01,C03	
1011107SOMS3-57-0-C(5)	195910032	695974	1201446590	SAMPLE	Cesium-137	0.265	0.0707		0.0612	0.204	0.124	2.42	0.09	J	B01,C03
1011107SOMS3-57-0-C(5)	195910032	695974	1201446590	SAMPLE	Radium-226	1.30	0.193		0.138	1.162	0.914	6.23	0.25	C03	
1011107SOMS3-57-0-C(5)	195910032	695974	1201446590	SAMPLE	Radium-228	1.45	0.330		0.227	1.223	0.790	4.21	0.10	C03	
101107SOMS2-27-0-C(5)	195910033	695974	1201446590	SAMPLE	Cesium-137	0.326	0.0785		0.062	0.264	0.169	2.88		C03	
101107SOMS2-27-0-C(5)	195910033	695974	1201446590	SAMPLE	Radium-226	2.03	0.264		0.124	1.906	1.502	7.35		C03	
101107SOMS2-27-0-C(5)	195910033	695974	1201446590	SAMPLE	Radium-228	0.976	0.339		0.279	0.697	0.298	2.73		C03	
100907SOMS2-8-0-C(5)	195910034	695974	1201446590	SAMPLE	Cesium-137	1.70	0.173		0.0884	1.612	1.354	9.04		C03	
100907SOMS2-8-0-C(5)	195910034	695974	1201446590	SAMPLE	Radium-226	8.29	0.776		0.166	8.124	6.738	10.60		C03	
100907SOMS2-8-0-C(5)	195910034	695974	1201446590	SAMPLE	Radium-228	0.934	0.348		0.374	0.560	0.238	2.54	J	B01,C03	
101107SOMS4-7-0-C(5)	195910035	695974	1201446590	SAMPLE	Cesium-137	0.199	0.073		0.0701	0.129	0.053	1.69	J	B01,C03	

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation				
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual
101107SOMS4-7-0-C(5)	195910035	695974	1201446590	SAMPLE	Radium-226	1.32	0.216		0.126	1.194	0.888	5.71		C03
101107SOMS4-7-0-C(5)	195910035	695974	1201446590	SAMPLE	Radium-228	1.22	0.317		0.195	1.025	0.586	3.66		C03
100907SOMS-12-0-C(5)	195910037	695974	1201446590	SAMPLE	Cesium-137	0.00	0.0944	UI	0.091	-0.091	-0.189	0.32	UJ	Q02,C03
100907SOMS-12-0-C(5)	195910037	695974	1201446590	SAMPLE	Radium-226	3.12	0.390		0.158	2.962	2.340	7.81		C03
100907SOMS-12-0-C(5)	195910037	695974	1201446590	SAMPLE	Radium-228	1.24	0.355		0.305	0.935	0.530	3.34		C03
100907SOMS3-18-0-C(5)	195910038	695974	1201446590	SAMPLE	Cesium-137	0.00	0.0768	UI	0.0822	-0.082	-0.154	0.36	UJ	Q02,C03
100907SOMS3-18-0-C(5)	195910038	695974	1201446590	SAMPLE	Radium-226	2.74	0.357		0.145	2.595	2.026	7.46		C03
100907SOMS3-18-0-C(5)	195910038	695974	1201446590	SAMPLE	Radium-228	1.34	0.400		0.281	1.059	0.540	3.22		C03
100907SOMS-13-0-C(5)	195910039	695974	1201446590	SAMPLE	Cesium-137	0.00	0.0687	UI	0.0763	-0.076	-0.137	0.38	UJ	Q02,C03
100907SOMS-13-0-C(5)	195910039	695974	1201446590	SAMPLE	Radium-226	3.11	0.329		0.141	2.969	2.452	9.18		C03
100907SOMS-13-0-C(5)	195910039	695974	1201446590	SAMPLE	Radium-228	1.28	0.339		0.285	0.995	0.602	3.61		C03
100907SOMS3-20-0-C(5)	195910040	695974	1201446590	SAMPLE	Cesium-137	0.173	0.0793		0.0889	0.084	0.014	1.35	J	B01,C03
100907SOMS3-20-0-C(5)	195910040	695974	1201446590	SAMPLE	Radium-226	5.61	0.582		0.154	5.456	4.446	9.52		C03
100907SOMS3-20-0-C(5)	195910040	695974	1201446590	SAMPLE	Radium-228	1.02	0.432		0.338	0.682	0.156	2.25	J	B01,C03
100907SOMS-16-0-C(5)	195910041	695974	1201446590	SAMPLE	Cesium-137	0.213	0.0542		0.0358	0.177	0.105	2.13	J	B01,C03
100907SOMS-16-0-C(5)	195910041	695974	1201446590	SAMPLE	Radium-226	2.17	0.241		0.0961	2.074	1.688	8.57		C03
100907SOMS-16-0-C(5)	195910041	695974	1201446590	SAMPLE	Radium-228	1.50	0.313		0.170	1.330	0.874	4.59		C03
MB	1201446584	695972	1201446584	MB	Cesium-137	0.00144	0.0181	U	0.0308					
MB	1201446584	695972	1201446584	MB	Radium-226	0.0181	0.0416	U	0.069					
MB	1201446584	695972	1201446584	MB	Radium-228	0.0358	0.063	U	0.118					
101207SOMS3-29-0-C(5)	195906026	695972	1201446584	SAMPLE	Cesium-137	-0.000163	0.0257	U	0.0435			ND		
101207SOMS3-29-0-C(5)	195906026	695972	1201446584	SAMPLE	Radium-226	1.08	0.150		0.0736			0.04		
101207SOMS3-29-0-C(5)	195906026	695972	1201446584	SAMPLE	Radium-228	1.00	0.266		0.145			0.07		
101207SOMS3-29-0-C(5)	1201446585	695972	1201446584	DUP	Cesium-137	-0.0217	0.0326	U	0.0518					
101207SOMS3-29-0-C(5)	1201446585	695972	1201446584	DUP	Radium-226	1.10	0.190		0.0947					
101207SOMS3-29-0-C(5)	1201446585	695972	1201446584	DUP	Radium-228	1.05	0.275		0.164					
MB	1201446587	695973	1201446587	MB	Cesium-137	-0.0016	0.0169	U	0.0282					
MB	1201446587	695973	1201446587	MB	Radium-226	0.000251	0.0375	U	0.0641					
MB	1201446587	695973	1201446587	MB	Radium-228	0.136	0.094	U	0.147					
100907SOMS3-70-0-C(5)	1201446588	695973	1201446587	DUP	Cesium-137	0.161	0.0546		0.0569					
100907SOMS3-70-0-C(5)	1201446588	695973	1201446587	DUP	Radium-226	1.21	0.160		0.0893					
100907SOMS3-70-0-C(5)	1201446588	695973	1201446587	DUP	Radium-228	1.13	0.264		0.178					
MB	1201446590	695974	1201446590	MB	Cesium-137	0.00528	0.0341	U	0.059					
MB	1201446590	695974	1201446590	MB	Radium-226	0.0591	0.140	U	0.103					
MB	1201446590	695974	1201446590	MB	Radium-228	0.0421	0.217	U	0.249					
1011107SOMS3-57-0-C(5)	1201446591	695974	1201446590	DUP	Cesium-137	0.249	0.0592		0.0589					
1011107SOMS3-57-0-C(5)	1201446591	695974	1201446590	DUP	Radium-226	1.44	0.201		0.104					
1011107SOMS3-57-0-C(5)	1201446591	695974	1201446590	DUP	Radium-228	1.36	0.335		0.189					

Dupl RPD=	Cesium-137	ND	-0.000163	< 5* MDL	NA	0.0435	0.2175
	Radium-226	-2	1.08	> 5* MDL	20	0.0736	0.368
	Radium-228	-5	1.00	> 5* MDL	20	0.145	0.725
Dupl RPD=	Cesium-137	38	0.236	< 5* MDL	100	0.0699	0.3495
	Radium-226	14	1.39	> 5* MDL	20	0.135	0.675
	Radium-228	34	1.59	> 5* MDL	20	0.239	1.195

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
Dupl RPD=									0						
	Cesium-137	6				0.265	< 5* MDL	100	0.0612	0.306					
	Radium-226	-10				1.30	> 5* MDL	20	0.138	0.69					
	Radium-228	6				1.45	> 5* MDL	20	0.227	1.135					

MWH Client: Monsanto Company

MWH Project Name: CERCLA 2nd 5-Year Review

MWH Project Number: 1010076.011701

Laboratory: GEL Laboratories, LLC (Charleston, SC)

Data packages: Sample Delivery Group (SDG) Number 196017

Analytical Batches: 695974, 695975, and 695976

Method: Gamma Radium (Ra) 226 (²²⁶Ra), ²²⁸Ra, and ¹³⁷Cs by EML HASL 300, 4.5.2.3 and per the laboratory's SOP GL-RAD-A-013 Rev #14 (a gamma spectrometry method)

Guidance Documents: U.S. Department of Energy, *Evaluation of Radiochemical Data Usability*, es/er/ms-5, April 1997.

U.S. Department of Energy, Environmental Measurements Laboratory, *Health and Safety Laboratory (HASL)-300 Manual*, Section 4.5.2.3 (Ga-01-R: high resolution germanium detector gamma ray spectrometry), 28th Edition, February 1997.

Modification: Data Flags and Reason Codes as specified in Appendix A of *Evaluation of Radiochemical Data Usability* (see Attachment A below) were used to qualify the data, with modification for the evaluation of laboratory duplicate (duplicate sample error ratio used instead of normalized absolute difference).

Clarifications: Radiochemical tracers are referenced in the *Evaluation of Radiochemical Data Usability* guidance document, but are not applicable to gamma spectroscopy methods. Matrix spikes are also referenced, but were not used by GEL; data were not qualified because matrix spikes were not used. GEL did not provide calibration data. Results were not qualified, but sample results in the project database were populated with the applicable Reason Code (C03).

Attachment A: Validation Flags and Reason Codes

Attachment B: Validation Worksheet

Sample Cross Reference:

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
1	101107SOMS3-82-1-C(5)	10/11/07	196017001
2	101107SOMS3-82-2-C(5)	10/11/07	196017002
3	101107SOMS3-82-3-C(5)	10/11/07	196017003
4	101507SOMKMBACK-5-1-C-(5)	10/15/07	196017004
5	101507SOMKMBACK-5-2-C-(5)	10/15/07	196017005
6	101507SOMKMBACK-5-3-C-(5)	10/15/07	196017006
7	101307SOMS3-119-1-C(5)	10/13/07	196017007
8	101307SOMS3-119-2-C(5)	10/13/07	196017008
9	101307SOMS3-119-3-C(5)	10/13/07	196017009
10	101207SOMS3-89-1-C(5)	10/12/07	196017010
11	101207SOMS3-89-2-C(5)	10/12/07	196017011
12	101207SOMS3-89-3-C(5)	10/12/07	196017012
13	101207SOMS3-47-1-C(5)	10/12/07	196017013
14	101207SOMS3-47-2-C(5)	10/12/07	196017014
15	101207SOMS3-47-3-C(5)	10/12/07	196017015
16	101007SOMB-B-3-1-C(5)	10/10/07	196017016
17	101007SOMB-B-3-2-C(5)	10/10/07	196017017
18	101007SOMB-B-3-3-C(5)	10/10/07	196017018
19	101007SOMD-2-1-C(5)	10/10/07	196017019
20	101007SOMD-2-2-C(5)	10/10/07	196017020
21	101007SOMD-2-3-C(5)	10/10/07	196017021
22	101107SOMS2-11-1-C(5)	10/11/07	196017022
23	101107SOMS2-11-2-C(5)	10/11/07	196017023
24	101107SOMS2-11-3-C(5)	10/11/07	196017024
25	101107SOMS4-16-1-C(5)	10/11/07	196017025
26	101107SOMS4-16-2-C(5)	10/11/07	196017026
27	101107SOMS4-16-3-C(5)	10/11/07	196017027
28	100907SOMS-15-1-C(5)	10/09/07	196017028
29	100907SOMS-15-2-C(5)	10/09/07	196017029
30	100907SOMS-15-3-C(5)	10/09/07	196017030
31	100907SOMS2-06-1-C(5)	10/09/07	196017031
32	100907SOMS2-06-2-C(5)	10/09/07	196017032
33	100907SOMS2-06-3-C(5)	10/09/07	196017033
34	100907SOMS3-99-1-C(5)	10/09/07	196017034
35	100907SOMS3-99-2-C(5)	10/09/07	196017035
36	100907SOMS3-99-3-C(5)	10/09/07	196017036
37	101307SOMS3-79-1-C(5)	10/13/07	196017037
38	101307SOMS3-79-2-C(5)	10/13/07	196017038
39	101307SOMS3-79-3-C(5)	10/13/07	196017039
40	101307SOMS3-12-1-C(5)	10/13/07	196017040
41	101307SOMS3-12-2-C(5)	10/13/07	196017041
42	101307SOMS3-12-3-C(5)	10/13/07	196017042
43	101307SOMS3-112-1-C(5)	10/13/07	196017043
44	101307SOMS3-112-2-C(5)	10/13/07	196017044
45	101307SOMS3-112-3-C(5)	10/13/07	196017045

No.	Field Sample Identification	Date Collected	Laboratory Sample Identification
46	101207SOMS2-35-1-C(5)	10/12/07	196017046
47	101207SOMS2-35-2-C(5)	10/12/07	196017047
48	101207SOMS2-35-3-C(5)	10/12/07	196017048
49	101307SOMS3-09-1-C(5)	10/13/07	196017049
50	101307SOMS3-09-2-C(5)	10/13/07	196017050
51	101307SOMS3-09-3-C(5)	10/13/07	196017051

I. Chain-of-Custody Procedure, Sample Preservation, and Holding Time

- Signatures on chain(s) and all samples accounted for
 ²²⁶Ra, ²²⁸Ra, ¹³⁷Cs: collected in HDPE (polyethylene) containers

A total of 51 soil (17 triplicate samples) samples were collected between October 9 and 15, 2007 in HDPE containers. All samples collected during this week were shipped in 11 coolers, and arrived at the laboratory on October 17, 2007. Sample chain-of-custody and laboratory receipt documentation appears intact. The 51 samples were prepared on October 19, 2007 and analyzed between November 3 and 5, 2007, 19 to 28 days into the 6-month laboratory-referenced holding time.

II. Instrument Calibration

- Confirm summary report includes: dates of calibration, geometry, count times for all analysis, number of counts for each standard, measured activity for all samples
— Confirm matrix used in geometry standard
— Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
— Calibration points including efficiency, energy, and peak resolution

Initial calibration data were not assessed because none was provided in the data package.

III. Calibration Verification

- Tolerance chart or statistical control chart of the appropriate 20 efficiencies and 20 relevant peak energies with 3 F+- limits
— Resolution demonstration of relevant peak(s)
— Listing of X/Y coordinates in constructing the control charts
— Evidence of decay correction of standard prior to calculation of efficiencies, as appropriate
— Geometries used in analysis

Calibration verification data were not assessed because none was provided in the data package.

IV. Target Compound Identification and Quantitation

- Confirm all samples less than MDC are qualified not detected (U)
 Less than two times the uncertainty were reported by the laboratory as not detected (U)

All sample results that were either less than two times the uncertainty were reported by the laboratory as not detected (U), or were greater than two times the uncertainty and greater than the minimum detectable concentration (MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result Minus 2*Uncert	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS3-82-1-C(5)	196017001	¹³⁷ Cs	-0.017	0.168	UJ	Q09
101207SOMS3-89-1-C(5)	196017010	²²⁸ Ra	-0.024	0.556	UJ	Q09
101207SOMS3-89-3-C(5)	196017012	²²⁸ Ra	-0.099	0.511	UJ	Q09
101107SOMS2-11-1-C(5)	196017022	¹³⁷ Cs	-0.007	0.160	UJ	Q09
101107SOMS4-16-1-C(5)	196017025	²²⁸ Ra	-0.058	0.532	UJ	Q09
100907SOMS3-99-1-C(5)	196017034	²²⁸ Ra	-0.050	0.618	UJ	Q09
100907SOMS3-99-2-C(5)	196017035	²²⁸ Ra	-0.100	0.666	UJ	Q09

Results were flagged as not detected (UJ) at the reported concentrations because they failed both the above “two times uncertainty” criterion and the blank criterion specified in Section V below.

Additionally, the laboratory qualified the following sample as footnoted:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101307SOMS3-119-1-C(5)	196017007	¹³⁷ Cs	0.00 UI ^a	R	P03
101207SOMS3-89-1-C(5)	196017010	¹³⁷ Cs	0.00 UI ^b	UJ	Q02
101107SOMS4-16-2-C(5)	196017026	²²⁸ Ra	0.00 UI ^c	UJ	Q02
100907SOMS3-99-3-C(5)	196017036	²²⁸ Ra	0.00 UI ^b	UJ	Q02

^a Data rejected due to high peak-width.

^b Data rejected due to no valid peak.

^c Data rejected due to low abundance.

“Data rejected due to high peak-width” is interpreted to be a loss of resolution for the detected peak, so is considered rejected (R). “Data rejected due to no valid peak” and “Data rejected due to low abundance” are interpreted to be that there was positive interference at the target frequency that did not meet the qualitative criteria for the target isotope, so the observed result is treated as not detected (UJ).

V. Blanks

Method blank results < MDC

Calculate normalized absolute difference (NAD) = $|(\text{Sample} - \text{Blank})| / ([\text{Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Blank}}^2]^{1/2})$

If normalized absolute difference is > 2.58, no action necessary

If normalized absolute difference is between 1.96 and 2.58, qualify sample J

If normalized absolute difference is less than 1.96, consider rejecting data

All normalized absolute differences (per above calculation) were greater than 2.58 for all sample results that were reportable (that is, reported as a detection above the MDC), with the following exceptions:

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS3-82-1-C(5)	196017001	¹³⁷ Cs	1.65	0.168	J	B01
101107SOMS3-82-1-C(5)	196017001	²²⁸ Ra	2.18	1.05	J	B01

Field Sample Identification	Laboratory Sample Identification	Parameter	NAD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101107SOMS3-82-2-C(5)	196017002	^{228}Ra	2.37	0.963	J	B01
101107SOMS3-82-3-C(5)	196017003	^{228}Ra	2.46	1.04	J	B01
101307SOMS3-119-3-C(5)	196017009	^{228}Ra	2.54	0.915	J	B01
101207SOMS3-89-1-C(5)	196017010	^{228}Ra	1.42	0.556	J	B01
101207SOMS3-89-2-C(5)	196017011	^{228}Ra	2.00	0.842	J	B01
101207SOMS3-89-3-C(5)	196017012	^{228}Ra	1.39	0.511	J	B01
101207SOMS3-47-3-C(5)	196017015	^{228}Ra	2.43	1.20	J	B01
101107SOMS2-11-1-C(5)	196017022	^{137}Cs	1.83	0.160	J	B01
101107SOMS2-11-2-C(5)	196017023	^{137}Cs	2.03	0.138	J	B01
101107SOMS4-16-1-C(5)	196017025	^{228}Ra	1.50	0.532	J	B01
101107SOMS4-16-3-C(5)	196017027	^{228}Ra	1.91	0.527	J	B01
100907SOMS-15-2-C(5)	196017029	^{137}Cs	2.09	0.235	J	B01
100907SOMS2-06-2-C(5)	196017032	^{137}Cs	2.32	0.171	J	B01
100907SOMS3-99-1-C(5)	196017034	^{228}Ra	1.79	0.618	J	B01
100907SOMS3-99-2-C(5)	196017035	^{228}Ra	1.69	0.666	J	B01
101307SOMS3-09-1-C(5)	196017049	^{228}Ra	2.23	0.871	J	B01
101307SOMS3-09-2-C(5)	196017050	^{228}Ra	2.14	0.661	J	B01

VI. Laboratory Duplicates

- Must be analyzed for each batch or for every 20 samples
- RPDs within the laboratory's control limits (RPD not calculated when one or both duplicate results are not detected)
- Calculate the duplicate error ratio (DER) =
$$|(\text{Sample} - \text{Duplicate})| / (2 * (\text{[Uncertainty}_{\text{Sample}}^2 + \text{Uncertainty}_{\text{Duplicate}}^2])^{1/2})$$
- $\text{DER} \leq 1.42$
- If DER > 1.42, qualify sample J

The laboratory's laboratory duplicate criteria are: If duplicate activities are less than 5 times MDC, then the RPD should be less than 100%; if activities are greater than 5 times the MDC, the RPD should be less than 20%.

With the following exception, all RPDs and DERs associated with both laboratory duplicate pairs were within these criteria:

Field Sample Identification	Laboratory Sample Identification	Parameter	RPD	Result (pCi/g)/Lab Flag	Data Validation Flag	Reason Code
101207SOMS3-47-2-C(5)	196017014	^{228}Ra	33	1.36	None	None
100907SOMS2-06-2-C(5)	196017032	^{228}Ra	31	1.50	None	None

Although the RPDs of 33 and 31 for the duplicate pairs were greater than the control limit of 20, the DERs of 0.39 and 38, respectively, were within control. The variance does not constitute a significant difference, so neither the primary sample results nor associated samples results were qualified.

VII. Laboratory Control Samples

- Must be analyzed for each batch or for every 20 samples

X Compare %R with lab control limits (75-125%)

All recoveries for each laboratory control samples were within control limits.

VIII. Equipment and Water Blank Samples

A total of 17 equipment blanks and 17 water blanks were collected between October 9 and 15, 2007 for gamma spectrometry analysis, including analysis for ^{226}Ra and ^{137}Cs (see data validation report for GEL SDG 195907). All equipment blanks and water blanks were not detected for both ^{226}Ra and ^{137}Cs .

IX. Overall Assessment of Data

With the following exceptions, all quality control data associated with the field samples were within control limits. All other field results are usable as reported by the laboratory.

Summary of Qualified Data:

Field Sample Identification	Laboratory Sample Identification	Parameter	Result (pCi/g)/Lab Flag	Data Validation Result/Flag	Reason Code
All sample results				No flag	C03
101107SOMS3-82-1-C(5)	196017001	^{137}Cs	0.168	UJ	Q09,B01
101107SOMS3-82-1-C(5)	196017001	^{228}Ra	1.05	J	B01
101107SOMS3-82-2-C(5)	196017002	^{228}Ra	0.963	J	B01
101107SOMS3-82-3-C(5)	196017003	^{228}Ra	1.04	J	B01
101307SOMS3-119-1-C(5)	196017007	^{137}Cs	0.00 UI	R	P03
101307SOMS3-119-3-C(5)	196017009	^{228}Ra	0.915	J	B01
101207SOMS3-89-1-C(5)	196017010	^{137}Cs	0.00 UI	UJ	Q02
101207SOMS3-89-1-C(5)	196017010	^{228}Ra	0.556	UJ	Q09,B01
101207SOMS3-89-2-C(5)	196017011	^{228}Ra	0.842	J	B01
101207SOMS3-89-3-C(5)	196017012	^{228}Ra	0.511	UJ	Q09,B01
101207SOMS3-47-3-C(5)	196017015	^{228}Ra	1.20	J	B01
101107SOMS2-11-1-C(5)	196017022	^{137}Cs	0.160	UJ	Q09,B01
101107SOMS2-11-2-C(5)	196017023	^{137}Cs	0.138	J	B01
101107SOMS4-16-1-C(5)	196017025	^{228}Ra	0.532	UJ	Q09,B01
101107SOMS4-16-2-C(5)	196017026	^{228}Ra	0.00 UI	UJ	Q02
101107SOMS4-16-3-C(5)	196017027	^{228}Ra	0.527	J	B01
100907SOMS-15-2-C(5)	196017029	^{137}Cs	0.235	J	B01
100907SOMS2-06-2-C(5)	196017032	^{137}Cs	0.171	J	B01
100907SOMS3-99-1-C(5)	196017034	^{228}Ra	0.618	UJ	Q09,B01
100907SOMS3-99-2-C(5)	196017035	^{228}Ra	0.666	UJ	Q09,B01
100907SOMS3-99-3-C(5)	196017036	^{228}Ra	0.00 UI	UJ	Q02
101307SOMS3-09-1-C(5)	196017049	^{228}Ra	0.871	J	B01
101307SOMS3-09-2-C(5)	196017050	^{228}Ra	0.661	J	B01

ATTACHMENT A**Radiochemical Data Verification and Validation: Per Appendix A in *Evaluation of Radiochemical Data Usability, es/er/ms-5 USDOE April, 1995***

Flag	Definition
U	Nuclide considered not detected above the reported MDC or 2 times the uncertainty
J	Nuclide identified; the associated value is approximated
UJ	Nuclide not detected above the reported MDC or 2 times the uncertainty and a quality deficiency affects the data and impacts the uncertainty of the reported data
R	Result is not usable for its intended purpose

Reason Code	Definition
<i>Method Blank</i>	
B01	Concentration of contaminant in the method blank at a level \geq the qualification level
B02	Method blank was not the same matrix as the analytical samples
B03	Gross contamination exists
B04	Blanks were not analyzed at the appropriate frequency
B05	Sample not significantly different than radiochemical method blank
B06	Blank data not reports
B07	Other (describe in comments)
<i>Calibration</i>	
C01	Initial calibration sequence was not followed as appropriate
C02	Calibration was not performed at the appropriate frequency
C03	Calibration data not reported
C04	Calibration not performed
C05	Chemical resolution criteria were not satisfied
C06	Standard curve was established with fewer than the required number of standards
C07	Instrumental system determined to be out of control
C08	Other (describe in comments)
<i>Laboratory Duplicate</i>	
D01	Significant difference between sample and duplicate
D02	Laboratory duplicate was not analyzed at the appropriate frequency
D03	Laboratory duplicate data was not reported
D04	Other (describe in comments)
<i>Evidentiary Concerns</i>	
E01	Custody of sample in question
E02	Standard not traceable
E03	Other (describe in comments)
<i>General</i>	
G01	Professional judgment was used to qualify the data
G02	Other (describe in comments)
<i>Holding Times</i>	
H01	Holding times were exceeded
H02	Holding times were grossly exceeded
H03	Samples were not preserved properly
H04	Other (describe in comments)
<i>Laboratory Control Sample</i>	
L01	LCS recovery above upper control limit
L02	LCS recovery below lower control limit
L03	LCS was not analyzed at appropriate frequency

Reason Code	Definition
L04	LCS not the same matrix as the analytical samples
L05	LCS data not reported
L06	Other (describe in comments)
<i>Matrix Spike and MS/MSD</i>	
M01	MS recovery above upper control limit
M02	MS recovery below lower control limit
M03	MS not analyzed at the appropriate frequency
M04	MS data not reported
M05	Other (describe in comments)
<i>Instrument Performance</i>	
P01	High background levels or a shift in the energy calibration were observed
P02	Extraneous peaks were observed
P03	Loss of resolution was observed
P04	Peak-tailing or peak splitting that may result in inaccurate quantitation were observed
P05	Instrument performance not analyzed at the appropriate frequency
P06	Other (describe in comments)
<i>Quantitation</i>	
Q01	Peak misidentified
Q02	Target analyte affected by interfering peak
Q03	Qualitative criteria were not satisfied
Q04	Cross contamination occurred
Q05	No raw data were provided to confirm Quantitation
Q06	MDC > RDL
Q07	Inappropriate aliquot sizes were used
Q08	Sample result < MDC
Q09	Sample result < 2s uncertainty
Q10	Negative result
Q11	Compounds were not adequately resolved
Q12	Sample weight different from calibration geometry
Q13	Sample weight greater than greatest weight on mass attenuation curve
Q14	Other (describe in comments)
<i>Radiochemical Yield</i>	
Y01	Radiochemical tracer yield was above the upper control limit
Y02	Radiochemical tracer yield was below the lower control limit
Y03	Radiochemical tracer yield was zero
Y04	Radiochemical yield data was not present
Y05	Other (describe in comments)

ATTACHMENT B: DATA VALIDATION_WORKSHEET
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101107SOMS3-82-1-C(5)	196017001	695974	1201446590	SAMPLE	Cesium-137	0.168	0.0924		0.0934	0.075	-0.017	1.65		UJ	Q09,B01C03
101107SOMS3-82-1-C(5)	196017001	695974	1201446590	SAMPLE	Radium-226	1.50	0.260		0.149	1.351	0.980	4.88			C03
101107SOMS3-82-1-C(5)	196017001	695974	1201446590	SAMPLE	Radium-228	1.05	0.409		0.344	0.706	0.232	2.18		J	B01,C03
101107SOMS3-82-2-C(5)	196017002	695974	1201446590	SAMPLE	Cesium-137	0.228	0.0617		0.0536	0.174	0.105	3.16			C03
101107SOMS3-82-2-C(5)	196017002	695974	1201446590	SAMPLE	Radium-226	1.41	0.221		0.127	1.283	0.968	5.16			C03
101107SOMS3-82-2-C(5)	196017002	695974	1201446590	SAMPLE	Radium-228	0.963	0.322		0.250	0.713	0.319	2.37		J	B01,C03
101107SOMS3-82-3-C(5)	196017003	695974	1201446590	SAMPLE	Cesium-137	0.281	0.0705		0.0675	0.214	0.140	3.52			C03
101107SOMS3-82-3-C(5)	196017003	695974	1201446590	SAMPLE	Radium-226	1.45	0.240		0.117	1.333	0.970	5.01			C03
101107SOMS3-82-3-C(5)	196017003	695974	1201446590	SAMPLE	Radium-228	1.04	0.343		0.212	0.828	0.354	2.46		J	B01,C03
101507SOMKMBACK-5-1-C-(5)	196017004	695974	1201446590	SAMPLE	Cesium-137	1.96	0.189		0.0782	1.882	1.582	10.18			C03
101507SOMKMBACK-5-1-C-(5)	196017004	695974	1201446590	SAMPLE	Radium-226	1.10	0.228		0.154	0.946	0.644	3.89			C03
101507SOMKMBACK-5-1-C-(5)	196017004	695974	1201446590	SAMPLE	Radium-228	1.25	0.318		0.214	1.036	0.614	3.14			C03
101507SOMKMBACK-5-2-C-(5)	196017005	695974	1201446590	SAMPLE	Cesium-137	1.69	0.205		0.0761	1.614	1.280	8.11			C03
101507SOMKMBACK-5-2-C-(5)	196017005	695974	1201446590	SAMPLE	Radium-226	1.03	0.271		0.154	0.876	0.488	3.18			C03
101507SOMKMBACK-5-2-C-(5)	196017005	695974	1201446590	SAMPLE	Radium-228	1.26	0.407		0.311	0.949	0.446	2.64			C03
101507SOMKMBACK-5-3-C-(5)	196017006	695974	1201446590	SAMPLE	Cesium-137	1.65	0.171		0.0613	1.589	1.308	9.43			C03
101507SOMKMBACK-5-3-C-(5)	196017006	695974	1201446590	SAMPLE	Radium-226	1.34	0.230		0.108	1.232	0.880	4.76			C03
101507SOMKMBACK-5-3-C-(5)	196017006	695974	1201446590	SAMPLE	Radium-228	0.983	0.282		0.199	0.784	0.419	2.64			C03
101307SOMS3-119-1-C(5)	196017007	695974	1201446590	SAMPLE	Cesium-137	0.00	0.0767	UI	0.072	-0.072	-0.153	0.06		UJ	Q02,C03
101307SOMS3-119-1-C(5)	196017007	695974	1201446590	SAMPLE	Radium-226	1.29	0.201		0.121	1.169	0.888	5.03			C03
101307SOMS3-119-1-C(5)	196017007	695974	1201446590	SAMPLE	Radium-228	0.952	0.278		0.184	0.768	0.396	2.58			C03
101307SOMS3-119-2-C(5)	196017008	695974	1201446590	SAMPLE	Cesium-137	-0.0226	0.0535	U	0.0743	-0.097	-0.130	0.44			C03
101307SOMS3-119-2-C(5)	196017008	695974	1201446590	SAMPLE	Radium-226	1.25	0.197		0.147	1.103	0.856	4.93			C03
101307SOMS3-119-2-C(5)	196017008	695974	1201446590	SAMPLE	Radium-228	1.17	0.317		0.225	0.945	0.536	2.94			C03
101307SOMS3-119-3-C(5)	196017009	695974	1201446590	SAMPLE	Cesium-137	0.0243	0.052	U	0.0667	-0.042	-0.080	0.31			C03
101307SOMS3-119-3-C(5)	196017009	695974	1201446590	SAMPLE	Radium-226	1.26	0.213		0.125	1.135	0.834	4.71			C03
101307SOMS3-119-3-C(5)	196017009	695974	1201446590	SAMPLE	Radium-228	0.915	0.267		0.234	0.681	0.381	2.54		J	B01,C03
101207SOMS3-89-1-C(5)	196017010	695974	1201446590	SAMPLE	Cesium-137	0.00	0.0768	UI	0.0794	-0.079	-0.154	0.06		UJ	Q02,C03
101207SOMS3-89-1-C(5)	196017010	695974	1201446590	SAMPLE	Radium-226	4.16	0.456		0.156	4.004	3.248	8.60			C03
101207SOMS3-89-1-C(5)	196017010	695974	1201446590	SAMPLE	Radium-228	0.556	0.290		0.289	0.267	-0.024	1.42		UJ	Q09,B01C03
101207SOMS3-89-2-C(5)	196017011	695974	1201446590	SAMPLE	Cesium-137	0.344	0.126		0.124	0.220	0.092	2.59			C03
101207SOMS3-89-2-C(5)	196017011	695974	1201446590	SAMPLE	Radium-226	4.57	0.522		0.190	4.380	3.526	8.35			C03
101207SOMS3-89-2-C(5)	196017011	695974	1201446590	SAMPLE	Radium-228	0.842	0.336		0.402	0.440	0.170	2.00		J	B01,C03
101207SOMS3-89-3-C(5)	196017012	695975	1201446593	SAMPLE	Cesium-137	0.307	0.0863		0.0697	0.237	0.134	3.41			C03
101207SOMS3-89-3-C(5)	196017012	695975	1201446593	SAMPLE	Radium-226	3.49	0.393		0.140	3.350	2.704	8.69			C03
101207SOMS3-89-3-C(5)	196017012	695975	1201446593	SAMPLE	Radium-228	0.511	0.305		0.271	0.240	-0.099	1.39		UJ	Q09,B01C03
101207SOMS3-47-1-C(5)	196017013	695975	1201446593	SAMPLE	Cesium-137	2.58	0.236		0.0994	2.481	2.108	10.87			C03
101207SOMS3-47-1-C(5)	196017013	695975	1201446593	SAMPLE	Radium-226	2.68	0.347		0.183	2.497	1.986	7.51			C03
101207SOMS3-47-1-C(5)	196017013	695975	1201446593	SAMPLE	Radium-228	1.22	0.431		0.304	0.916	0.358	2.61			C03
101207SOMS3-47-2-C(5)	196017014	695975	1201446593	SAMPLE	Cesium-137	2.68	0.278		0.0822	2.598	2.124	9.60	0.00		C03
101207SOMS3-47-2-C(5)	196017014	695975	1201446593	SAMPLE	Radium-226	2.72	0.339		0.145	2.575	2.042	7.80	0.06		C03
101207SOMS3-47-2-C(5)	196017014	695975	1201446593	SAMPLE	Radium-228	1.36	0.358		0.239	1.121	0.644	3.47	0.39		C03
101207SOMS3-47-3-C(5)	196017015	695975	1201446593	SAMPLE	Cesium-137	2.57	0.291		0.113	2.457	1.988	8.80			C03
101207SOMS3-47-3-C(5)	196017015	695975	1201446593	SAMPLE	Radium-226	3.02	0.397		0.188	2.832	2.226	7.44			C03
101207SOMS3-47-3-C(5)	196017015	695975	1201446593	SAMPLE	Radium-228	1.20	0.457		0.350	0.850	0.286	2.43		J	B01,C03
101007SOMB-B-3-1-C(5)	196017016	695975	1201446593	SAMPLE	Cesium-137	1.82	0.188		0.067	1.753	1.444	9.59			C03
101007SOMB-B-3-1-C(5)	196017016	695975	1201446593	SAMPLE	Radium-226	0.943	0.196		0.121	0.822	0.551	4.43			C03

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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation						
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode	
101007SOMB-B-3-1-C(5)	196017016	695975	1201446593	SAMPLE	Radium-228	1.66	0.366		0.224	1.436	0.928	4.18			C03	
101007SOMB-B-3-2-C(5)	196017017	695975	1201446593	SAMPLE	Cesium-137	1.75	0.231		0.100	1.650	1.288	7.53			C03	
101007SOMB-B-3-2-C(5)	196017017	695975	1201446593	SAMPLE	Radium-226	1.11	0.245		0.194	0.916	0.620	4.27			C03	
101007SOMB-B-3-2-C(5)	196017017	695975	1201446593	SAMPLE	Radium-228	1.48	0.434		0.400	1.080	0.612	3.17			C03	
101007SOMB-B-3-3-C(5)	196017018	695975	1201446593	SAMPLE	Cesium-137	2.12	0.207		0.0754	2.045	1.706	10.16			C03	
101007SOMB-B-3-3-C(5)	196017018	695975	1201446593	SAMPLE	Radium-226	1.37	0.199		0.121	1.249	0.972	6.40			C03	
101007SOMB-B-3-3-C(5)	196017018	695975	1201446593	SAMPLE	Radium-228	1.41	0.350		0.268	1.142	0.710	3.67			C03	
101007SOMD-2-1-C(5)	196017019	695975	1201446593	SAMPLE	Cesium-137	0.805	0.124		0.0704	0.735	0.557	6.36			C03	
101007SOMD-2-1-C(5)	196017019	695975	1201446593	SAMPLE	Radium-226	1.04	0.187		0.124	0.916	0.666	5.10			C03	
101007SOMD-2-1-C(5)	196017019	695975	1201446593	SAMPLE	Radium-228	0.939	0.266		0.262	0.677	0.407	3.05			C03	
101007SOMD-2-2-C(5)	196017020	695975	1201446593	SAMPLE	Cesium-137	0.389	0.0879		0.0543	0.335	0.213	4.25			C03	
101007SOMD-2-2-C(5)	196017020	695975	1201446593	SAMPLE	Radium-226	1.15	0.173		0.0855	1.065	0.804	6.05			C03	
101007SOMD-2-2-C(5)	196017020	695975	1201446593	SAMPLE	Radium-228	1.09	0.298		0.159	0.931	0.494	3.24			C03	
101007SOMD-2-3-C(5)	196017021	695975	1201446593	SAMPLE	Cesium-137	0.788	0.120		0.0651	0.723	0.548	6.42			C03	
101007SOMD-2-3-C(5)	196017021	695975	1201446593	SAMPLE	Radium-226	1.15	0.197		0.123	1.027	0.756	5.40			C03	
101007SOMD-2-3-C(5)	196017021	695975	1201446593	SAMPLE	Radium-228	1.11	0.325		0.240	0.870	0.460	3.06			C03	
101107SOMS2-11-1-C(5)	196017022	695975	1201446593	SAMPLE	Cesium-137	0.160	0.0834		0.0608	0.099	-0.007	1.83	UJ	Q09,B01C03		
101107SOMS2-11-1-C(5)	196017022	695975	1201446593	SAMPLE	Radium-226	1.62	0.230		0.114	1.506	1.160	6.65			C03	
101107SOMS2-11-1-C(5)	196017022	695975	1201446593	SAMPLE	Radium-228	1.10	0.288		0.206	0.894	0.524	3.37			C03	
101107SOMS2-11-2-C(5)	196017023	695975	1201446593	SAMPLE	Cesium-137	0.138	0.0629		0.0628	0.075	0.012	2.03	J	B01,C03		
101107SOMS2-11-2-C(5)	196017023	695975	1201446593	SAMPLE	Radium-226	1.65	0.226		0.119	1.531	1.198	6.89			C03	
101107SOMS2-11-2-C(5)	196017023	695975	1201446593	SAMPLE	Radium-228	1.20	0.321		0.241	0.959	0.558	3.35			C03	
101107SOMS2-11-3-C(5)	196017024	695975	1201446593	SAMPLE	Cesium-137	0.252	0.0815		0.0655	0.187	0.089	2.95			C03	
101107SOMS2-11-3-C(5)	196017024	695975	1201446593	SAMPLE	Radium-226	1.76	0.238		0.127	1.633	1.284	7.01			C03	
101107SOMS2-11-3-C(5)	196017024	695975	1201446593	SAMPLE	Radium-228	1.33	0.371		0.232	1.098	0.588	3.28			C03	
101107SOMS4-16-1-C(5)	196017025	695975	1201446593	SAMPLE	Cesium-137	0.541	0.108		0.0655	0.476	0.325	4.87			C03	
101107SOMS4-16-1-C(5)	196017025	695975	1201446593	SAMPLE	Radium-226	1.37	0.228		0.131	1.239	0.914	5.65			C03	
101107SOMS4-16-1-C(5)	196017025	695975	1201446593	SAMPLE	Radium-228	0.532	0.295		0.219	0.313	-0.058	1.50	UJ	Q09,B01C03		
101107SOMS4-16-2-C(5)	196017026	695975	1201446593	SAMPLE	Cesium-137	1.00	0.138		0.0821	0.918	0.724	7.12			C03	
101107SOMS4-16-2-C(5)	196017026	695975	1201446593	SAMPLE	Radium-226	2.51	0.323		0.124	2.386	1.864	7.53			C03	
101107SOMS4-16-2-C(5)	196017026	695975	1201446593	SAMPLE	Radium-228	0.00	0.290	UI	0.466	-0.466	-0.580	0.19	UJ	Q02,C03		
101107SOMS4-16-3-C(5)	196017027	695975	1201446593	SAMPLE	Cesium-137	0.645	0.106		0.0642	0.581	0.433	5.91			C03	
101107SOMS4-16-3-C(5)	196017027	695975	1201446593	SAMPLE	Radium-226	1.97	0.247		0.136	1.834	1.476	7.59			C03	
101107SOMS4-16-3-C(5)	196017027	695975	1201446593	SAMPLE	Radium-228	0.527	0.217		0.222	0.305	0.093	1.91	J	B01,C03		
100907SOMS-15-1-C(5)	196017028	695975	1201446593	SAMPLE	Cesium-137	0.306	0.0975		0.0958	0.210	0.111	3.03			C03	
100907SOMS-15-1-C(5)	196017028	695975	1201446593	SAMPLE	Radium-226	6.40	0.673		0.202	6.198	5.054	9.42			C03	
100907SOMS-15-1-C(5)	196017028	695975	1201446593	SAMPLE	Radium-228	1.26	0.440		0.341	0.919	0.380	2.65			C03	
100907SOMS-15-2-C(5)	196017029	695975	1201446593	SAMPLE	Cesium-137	0.235	0.109		0.106	0.129	0.017	2.09	J	B01,C03		
100907SOMS-15-2-C(5)	196017029	695975	1201446593	SAMPLE	Radium-226	6.06	0.597		0.161	5.899	4.866	10.04			C03	
100907SOMS-15-2-C(5)	196017029	695975	1201446593	SAMPLE	Radium-228	1.13	0.397		0.380	0.750	0.336	2.60			C03	
100907SOMS-15-3-C(5)	196017030	695975	1201446593	SAMPLE	Cesium-137	0.303	0.0829		0.102	0.201	0.137	3.49			C03	
100907SOMS-15-3-C(5)	196017030	695975	1201446593	SAMPLE	Radium-226	6.54	0.674		0.208	6.332	5.192	9.62			C03	
100907SOMS-15-3-C(5)	196017030	695975	1201446593	SAMPLE	Radium-228	1.52	0.444		0.438	1.082	0.632	3.19			C03	
100907SOMS2-06-1-C(5)	196017031	695975	1201446593	SAMPLE	Cesium-137	0.227	0.067		0.0667	0.160	0.093	3.16			C03	
100907SOMS2-06-1-C(5)	196017031	695975	1201446593	SAMPLE	Radium-226	1.14	0.200		0.114	1.026	0.740	5.28			C03	
100907SOMS2-06-1-C(5)	196017031	695975	1201446593	SAMPLE	Radium-228	1.32	0.341		0.250	1.070	0.638	3.51			C03	
100907SOMS2-06-2-C(5)	196017032	695976	1201446596	SAMPLE	Cesium-137	0.171	0.0781		0.0881	0.083	0.015	2.32	0.38	J	B01,C03	

ATTACHMENT B: DATA VALIDATION_WORKSHEET
GEL SDG 196017
CERCLA 2ND 5-YEAR REVIEW_SOIL 2007
MONSANTO
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
100907SOMS2-06-2-C(5)	196017032	695976	1201446596	SAMPLE	Radium-226	1.03	0.200		0.146	0.884	0.630	4.90	0.14		C03
100907SOMS2-06-2-C(5)	196017032	695976	1201446596	SAMPLE	Radium-228	1.50	0.411		0.268	1.232	0.678	3.57	0.38		C03
100907SOMS2-06-3-C(5)	196017033	695976	1201446596	SAMPLE	Cesium-137	0.254	0.0901		0.0705	0.184	0.074	2.93			C03
100907SOMS2-06-3-C(5)	196017033	695976	1201446596	SAMPLE	Radium-226	1.21	0.200		0.139	1.071	0.810	5.77			C03
100907SOMS2-06-3-C(5)	196017033	695976	1201446596	SAMPLE	Radium-228	1.14	0.337		0.259	0.881	0.466	3.27			C03
100907SOMS3-99-1-C(5)	196017034	695976	1201446596	SAMPLE	Cesium-137	1.98	0.241		0.0873	1.893	1.498	8.25			C03
100907SOMS3-99-1-C(5)	196017034	695976	1201446596	SAMPLE	Radium-226	0.945	0.241		0.144	0.801	0.463	3.76			C03
100907SOMS3-99-1-C(5)	196017034	695976	1201446596	SAMPLE	Radium-228	0.618	0.334		0.263	0.355	-0.050	1.79	UJ	Q09,B01C03	
100907SOMS3-99-2-C(5)	196017035	695976	1201446596	SAMPLE	Cesium-137	1.15	0.159		0.0794	1.071	0.832	7.28			C03
100907SOMS3-99-2-C(5)	196017035	695976	1201446596	SAMPLE	Radium-226	0.630	0.171		0.148	0.482	0.288	3.43			C03
100907SOMS3-99-2-C(5)	196017035	695976	1201446596	SAMPLE	Radium-228	0.666	0.383		0.241	0.425	-0.100	1.69	UJ	Q09,B01C03	
100907SOMS3-99-3-C(5)	196017036	695976	1201446596	SAMPLE	Cesium-137	1.92	0.229		0.092	1.828	1.462	8.42			C03
100907SOMS3-99-3-C(5)	196017036	695976	1201446596	SAMPLE	Radium-226	1.16	0.213		0.157	1.003	0.734	5.21			C03
100907SOMS3-99-3-C(5)	196017036	695976	1201446596	SAMPLE	Radium-228	0.00	0.387	UI	0.250	-0.250	-0.774	0.00	UJ	Q02,C03	
101307SOMS3-79-1-C(5)	196017037	695976	1201446596	SAMPLE	Cesium-137	2.21	0.225		0.0784	2.132	1.760	9.85			C03
101307SOMS3-79-1-C(5)	196017037	695976	1201446596	SAMPLE	Radium-226	2.27	0.291		0.126	2.144	1.688	7.62			C03
101307SOMS3-79-1-C(5)	196017037	695976	1201446596	SAMPLE	Radium-228	0.259	0.175	U	0.269	-0.010	-0.091	1.32			C03
101307SOMS3-79-2-C(5)	196017038	695976	1201446596	SAMPLE	Cesium-137	1.93	0.205		0.0667	1.863	1.520	9.45			C03
101307SOMS3-79-2-C(5)	196017038	695976	1201446596	SAMPLE	Radium-226	2.05	0.276		0.139	1.911	1.498	7.24			C03
101307SOMS3-79-2-C(5)	196017038	695976	1201446596	SAMPLE	Radium-228	0.0793	0.228	U	0.238	-0.159	-0.377	0.33			C03
101307SOMS3-79-3-C(5)	196017039	695976	1201446596	SAMPLE	Cesium-137	1.76	0.203		0.0723	1.688	1.354	8.71			C03
101307SOMS3-79-3-C(5)	196017039	695976	1201446596	SAMPLE	Radium-226	1.67	0.248		0.144	1.526	1.174	6.52			C03
101307SOMS3-79-3-C(5)	196017039	695976	1201446596	SAMPLE	Radium-228	0.0485	0.194	U	0.304	-0.256	-0.340	0.23			C03
101307SOMS3-12-1-C(5)	196017040	695976	1201446596	SAMPLE	Cesium-137	0.272	0.0639		0.0678	0.204	0.144	4.30			C03
101307SOMS3-12-1-C(5)	196017040	695976	1201446596	SAMPLE	Radium-226	1.18	0.191		0.108	1.072	0.798	5.88			C03
101307SOMS3-12-1-C(5)	196017040	695976	1201446596	SAMPLE	Radium-228	1.39	0.277		0.194	1.196	0.836	4.77			C03
101307SOMS3-12-2-C(5)	196017041	695976	1201446596	SAMPLE	Cesium-137	0.223	0.0662		0.0697	0.153	0.091	3.46			C03
101307SOMS3-12-2-C(5)	196017041	695976	1201446596	SAMPLE	Radium-226	1.19	0.178		0.126	1.064	0.834	6.33			C03
101307SOMS3-12-2-C(5)	196017041	695976	1201446596	SAMPLE	Radium-228	1.27	0.324		0.222	1.048	0.622	3.78			C03
101307SOMS3-12-3-C(5)	196017042	695976	1201446596	SAMPLE	Cesium-137	0.280	0.0674		0.0698	0.210	0.145	4.21			C03
101307SOMS3-12-3-C(5)	196017042	695976	1201446596	SAMPLE	Radium-226	1.37	0.207		0.111	1.259	0.956	6.34			C03
101307SOMS3-12-3-C(5)	196017042	695976	1201446596	SAMPLE	Radium-228	1.04	0.283		0.230	0.810	0.474	3.50			C03
101307SOMS3-112-1-C(5)	196017043	695976	1201446596	SAMPLE	Cesium-137	0.290	0.110		0.0802	0.210	0.070	2.74			C03
101307SOMS3-112-1-C(5)	196017043	695976	1201446596	SAMPLE	Radium-226	1.30	0.235		0.158	1.142	0.830	5.33			C03
101307SOMS3-112-1-C(5)	196017043	695976	1201446596	SAMPLE	Radium-228	1.42	0.395		0.323	1.097	0.630	3.51			C03
101307SOMS3-112-2-C(5)	196017044	695976	1201446596	SAMPLE	Cesium-137	0.290	0.0948		0.0815	0.209	0.100	3.16			C03
101307SOMS3-112-2-C(5)	196017044	695976	1201446596	SAMPLE	Radium-226	1.21	0.227		0.118	1.092	0.756	5.12			C03
101307SOMS3-112-2-C(5)	196017044	695976	1201446596	SAMPLE	Radium-228	1.17	0.333		0.205	0.965	0.504	3.39			C03
101307SOMS3-112-3-C(5)	196017045	695976	1201446596	SAMPLE	Cesium-137	0.277	0.0765		0.073	0.204	0.124	3.71			C03
101307SOMS3-112-3-C(5)	196017045	695976	1201446596	SAMPLE	Radium-226	1.21	0.195		0.133	1.077	0.820	5.91			C03
101307SOMS3-112-3-C(5)	196017045	695976	1201446596	SAMPLE	Radium-228	0.907	0.295		0.250	0.657	0.317	2.94			C03
101207SOMS2-35-1-C(5)	196017046	695976	1201446596	SAMPLE	Cesium-137	0.410	0.0802		0.0705	0.340	0.250	5.16			C03
101207SOMS2-35-1-C(5)	196017046	695976	1201446596	SAMPLE	Radium-226	1.41	0.237		0.123	1.287	0.936	5.74			C03
101207SOMS2-35-1-C(5)	196017046	695976	1201446596	SAMPLE	Radium-228	1.15	0.286		0.241	0.909	0.578	3.84			C03
101207SOMS2-35-2-C(5)	196017047	695976	1201446596	SAMPLE	Cesium-137	0.367	0.0919		0.0921	0.275	0.183	4.07			C03
101207SOMS2-35-2-C(5)	196017047	695976	1201446596	SAMPLE	Radium-226	1.29	0.225		0.162	1.128	0.840	5.51			C03
101207SOMS2-35-2-C(5)	196017047	695976	1201446596	SAMPLE	Radium-228	1.51	0.349		0.255	1.255	0.812	4.19			C03

ATTACHMENT B: DATA VALIDATION_WORKSHEET
GEL SDG 196017
CERCLA 2ND 5-YEAR REVIEW_SOIL 2007
MONSANTO
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Sample_No	Lab_Id	Batch_No	Assoc_Blnk	Sample_Type	Parameter	Lab_Result	Uncertainty	Lab_Qual	MDL	Data Validation					
										Result-MDC	Result-2*Unc	Dval_MB	Dval_DER	Qual	ReasonCode
101207SOMS2-35-3-C(5)	196017048	695976	1201446596	SAMPLE	Cesium-137	0.372	0.0848		0.0747	0.297	0.202	4.45		C03	
101207SOMS2-35-3-C(5)	196017048	695976	1201446596	SAMPLE	Radium-226	1.36	0.203		0.124	1.236	0.954	6.41		C03	
101207SOMS2-35-3-C(5)	196017048	695976	1201446596	SAMPLE	Radium-228	1.36	0.281		0.197	1.163	0.798	4.61		C03	
101307SOMS3-09-1-C(5)	196017049	695976	1201446596	SAMPLE	Cesium-137	3.08	0.299		0.0781	3.002	2.482	10.33		C03	
101307SOMS3-09-1-C(5)	196017049	695976	1201446596	SAMPLE	Radium-226	4.85	0.526		0.151	4.699	3.798	9.14		C03	
101307SOMS3-09-1-C(5)	196017049	695976	1201446596	SAMPLE	Radium-228	0.871	0.380		0.263	0.608	0.111	2.23	J	B01,C03	
101307SOMS3-09-2-C(5)	196017050	695976	1201446596	SAMPLE	Cesium-137	3.88	0.351		0.0748	3.805	3.178	11.08		C03	
101307SOMS3-09-2-C(5)	196017050	695976	1201446596	SAMPLE	Radium-226	5.87	0.616		0.145	5.725	4.638	9.47		C03	
101307SOMS3-09-2-C(5)	196017050	695976	1201446596	SAMPLE	Radium-228	0.661	0.296		0.272	0.389	0.069	2.14	J	B01,C03	
101307SOMS3-09-3-C(5)	196017051	695976	1201446596	SAMPLE	Cesium-137	3.61	0.292		0.0691	3.541	3.026	12.39		C03	
101307SOMS3-09-3-C(5)	196017051	695976	1201446596	SAMPLE	Radium-226	6.07	0.571		0.135	5.935	4.928	10.56		C03	
101307SOMS3-09-3-C(5)	196017051	695976	1201446596	SAMPLE	Radium-228	0.964	0.271		0.258	0.706	0.422	3.38		C03	
MB	1201446590	695974	1201446590	MB	Cesium-137	0.00528	0.0341	U	0.059						
MB	1201446590	695974	1201446590	MB	Radium-226	0.0591	0.140	U	0.103						
MB	1201446590	695974	1201446590	MB	Radium-228	0.0421	0.217	U	0.249						
1011107SOMS3-57-0-C(5)	1201446591	695974	1201446590	DUP	Cesium-137	0.249	0.0592		0.0589						
1011107SOMS3-57-0-C(5)	1201446591	695974	1201446590	DUP	Radium-226	1.44	0.201		0.104						
1011107SOMS3-57-0-C(5)	1201446591	695974	1201446590	DUP	Radium-228	1.36	0.335		0.189						
1011107SOMS3-57-0-C(5)	195910032	695974	1201446590	SAMPLE	Cesium-137	0.265	0.0707		0.0612			0.09			
1011107SOMS3-57-0-C(5)	195910032	695974	1201446590	SAMPLE	Radium-226	1.30	0.193		0.138			0.25			
1011107SOMS3-57-0-C(5)	195910032	695974	1201446590	SAMPLE	Radium-228	1.45	0.330		0.227			0.10			
MB	1201446593	695975	1201446593	MB	Cesium-137	0.000787	0.0251	U	0.0429						
MB	1201446593	695975	1201446593	MB	Radium-226	0.0249	0.0679	U	0.106						
MB	1201446593	695975	1201446593	MB	Radium-228	0.0577	0.114	U	0.203						
101207SOMS3-47-2-C(5)	1201446594	695975	1201446593	DUP	Cesium-137	2.68	0.264		0.102						
101207SOMS3-47-2-C(5)	1201446594	695975	1201446593	DUP	Radium-226	2.78	0.383		0.182						
101207SOMS3-47-2-C(5)	1201446594	695975	1201446593	DUP	Radium-228	0.972	0.350		0.268						
MB	1201446596	695976	1201446596	MB	Cesium-137	-0.0158	0.0197	U	0.0288						
MB	1201446596	695976	1201446596	MB	Radium-226	0.0167	0.0521	U	0.0931						
MB	1201446596	695976	1201446596	MB	Radium-228	-0.000669	0.0901	U	0.154						
100907SOMS2-06-2-C(5)	1201446597	695976	1201446596	DUP	Cesium-137	0.257	0.0823		0.0603						
100907SOMS2-06-2-C(5)	1201446597	695976	1201446596	DUP	Radium-226	0.952	0.184		0.117						
100907SOMS2-06-2-C(5)	1201446597	695976	1201446596	DUP	Radium-228	1.11	0.316		0.193						

Dupl RPD=	Cesium-137	6	0.265	< 5* MDL	100	0.0612	0.306
	Radium-226	-10	1.30	> 5* MDL	20	0.138	0.69
	Radium-228	6	1.45	> 5* MDL	20	0.227	1.135
Dupl RPD=	Cesium-137	0	2.68	> 5* MDL	20	0.0822	0.411
	Radium-226	-2	2.72	> 5* MDL	20	0.145	0.725
	Radium-228	33	1.36	> 5* MDL	20	0.239	1.195
Dupl RPD=	Cesium-137	-40	0.171	< 5* MDL	100	0.0881	0.4405
	Radium-226	8	1.03	> 5* MDL	20	0.146	0.73
	Radium-228	30	1.50	> 5* MDL	20	0.268	1.34

APPENDIX B

GEL LABORATORIES LLC
 2040 Savage Road Charleston SC 29407 - (843) 556-8171 - www.gel.com

Certificate of Analysis

Company : MWH Americas, Inc.
 Address : 2353 130th Avenue NE
 Suite 200
 Bellevue, Washington 98005
 Contact: Ms. Sarah.E.VonRaesfeld
 Project: Split Samples

Report Date: March 27, 2008

Client Sample ID:	100907SOMS3-73-0-C(5)	Project:	MWHA00207
Sample ID:	204882001	Client ID:	MWHA001
Matrix:	Soil		
Collect Date:	09-OCT-07 14:30		
Receive Date:	17-OCT-07		
Collector:	Client		

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	Analyst	Date	Time	Batch	Method
Rad Gamma Spec Analysis												
<i>Gamma, Ra226, Solid</i>												
Cesium-137		0.776	+/-0.168	0.146	0.100	pCi/g		MJH1	03/26/08	0955	737557	1
Radium-226	UI	0.00	+/-0.282	0.227	1.00	pCi/g						
Radium-228	UI	0.00	+/-0.380	0.337	0.500	pCi/g						

The following Prep Methods were performed

Method	Description	Analyst	Date	Time	Prep Batch
Dry Soil Prep	Dry Soil Prep GL-RAD-A-021	BXJ1	03/19/08	1153	737274

The following Analytical Methods were performed

Method	Description	Analyst Comments
1	EML HASL 300, 4.5.2.3	

GEL LABORATORIES LLC
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QC Summary

Report Date: March 27, 2008
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MWH Americas, Inc.
2353 130th Avenue NE
Suite 200
Bellevue, Washington
Contact: Ms. Sarah.E.VonRaesfeld
Workorder: 204882

Paramname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	737557										
QC1201539862	204882001 DUP										
Cesium-137		0.776		0.788	pCi/g	1		(0% - 20%)	MJH1	03/26/08	12:03
		+/-0.168		+/-0.144							
Radium-226		UI	0.00	0.352	pCi/g	30		(0% - 100%)			
			+/-0.282	+/-0.189							
Radium-228		UI	0.00	UI	pCi/g	16			N/A		
			+/-0.380	+/-0.255							
QC1201539863	LCS	91.9		84.9	pCi/g		92	(75%-125%)		03/26/08	10:26
Americium-241				+/-7.24							
Cesium-137		34.9		35.9	pCi/g		103	(75%-125%)			
				+/-3.35							
Cobalt-60		47.3		44.9	pCi/g		95	(75%-125%)			
				+/-3.63							
Radium-226			U	0.570	pCi/g			(75%-125%)			
				+/-0.658							
Radium-228			U	1.55	pCi/g						
				+/-1.85							
QC1201539861	MB									03/26/08	10:13
Cesium-137			U	-0.0331	pCi/g						
				+/-0.0685							
Radium-226			U	0.00243	pCi/g						
				+/-0.150							
Radium-228			U	0.133	pCi/g						
				+/-0.261							

Notes:

The Qualifiers in this report are defined as follows:

- ** Analyte is a surrogate compound
- < Result is less than value reported
- > Result is greater than value reported
- A The TIC is a suspected aldol-condensation product
- B For General Chemistry and Organic analysis the target analyte was detected in the associated blank.
- BD Results are either below the MDC or tracer recovery is low
- C Analyte has been confirmed by GC/MS analysis
- D Results are reported from a diluted aliquot of the sample
- H Analytical holding time was exceeded

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QC Summary

Workorder: 204882

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
J	Value is estimated										
M	M if above MDC and less than LLD										
N/A	RPD or %Recovery limits do not apply.										
ND	Analyte concentration is not detected above the detection limit										
NJ	Consult Case Narrative, Data Summary package, or Project Manager concerning this qualifier										
R	Sample results are rejected										
U	Analyte was analyzed for, but not detected above the MDL, MDA, or LOD.										
UI	Gamma Spectroscopy--Uncertain identification										
X	Consult Case Narrative, Data Summary package, or Project Manager concerning this qualifier										
Y	QC Samples were not spiked with this compound										
^	RPD of sample and duplicate evaluated using +/-RL. Concentrations are <5X the RL. Qualifier Not Applicable for Radiochemistry.										
h	Preparation or preservation holding time was exceeded										

N/A indicates that spike recovery limits do not apply when sample concentration exceeds spike conc. by a factor of 4 or more.

^ The Relative Percent Difference (RPD) obtained from the sample duplicate (DUP) is evaluated against the acceptance criteria when the sample is greater than five times (5X) the contract required detection limit (RL). In cases where either the sample or duplicate value is less than 5X the RL, a control limit of +/- the RL is used to evaluate the DUP result.

* Indicates that a Quality Control parameter was not within specifications.

For PS, PSD, and SDILT results, the values listed are the measured amounts, not final concentrations.

Where the analytical method has been performed under NELAP certification, the analysis has met all of the requirements of the NELAC standard unless qualified on the QC Summary.

RAW DATA

VAX/VMS Nuclide Identification Report Generated

```
*****
*                               GEL Laboratories LLC
*                               2040 Savage Road
*                               Charleston, SC 29414
*****
*
*                               DETECTOR DATA
*
* Configuration      : DKA300:[CANBERRA.GAMMA.ARCHIVE.GAMMA]R204882001
* Acquisition date   : 26-MAR-2008 09:55:52 Detector SN# :
* Detector ID        : GAM15          Sensitivity    : 3.000
* Geometry           : BIGPETRI       Energy tolerance: 2.000
* Elapsed live time : 0 02:00:00.00 Abundance limit : 75.000
* Elapsed real time : 0 02:00:00.52 Half life ratio : 8.000
*****
*
*                               SAMPLE DATA
*
* Sample date         : 9-OCT-2007 14:30:00 Nuclide Library :
* Sample ID           : R204882001          Analyst initials: MJH1
* Batch Number        : 737557            Sample Quantity : 2.6990E+01 GRAM
* Recovery            : 1.00000          Carrier Weight  : 0.00000
*****
*
*                               QC DATA
*
* Standard Weight    : 0.00000
* CALIB. DATE/TIME   : 20-MAR-2008 09:58:32 MS Isotope   :
* MSD DPM             : 0.000          MSD Isotope   :
* LCS DPM             : 0.000          LCS Isotope   :
* LCSD DPM            : 0.000          LCSD Isotope :
```

Combined Activity-MDA Report

---- Identified Nuclides ----

Nuclide	Activity (pCi/GRAM)	Act error	MDA (pCi/GRAM)	
CS-137	7.764E-01	1.676E-01	1.457E-01	0.000E+00
RA-226	2.611E-01	2.816E-01	2.271E-01	0.000E+00
RA-228	6.580E-01	3.800E-01	3.366E-01	0.000E+00
U-238	5.917E+00	5.636E+00	5.730E+00	0.000E+00

---- Non-Identified Nuclides ----

Nuclide	Key-Line Activity (pCi/GRAM)	K.L. Ided	Act error	MDA (pCi/GRAM)	
CO-60	-5.348E-02		8.821E-02	1.260E-01	0.000E+00 NOT IDENT.
AM-241	-8.235E-02		5.253E-01	7.445E-01	0.000E+00 NOT IDENT.

APPENDIX C

Summary of report

This report covers an assessment of the 2007 sampling campaign from various viewpoints and comparison of the results with previous campaigns in 1996, 2002 and 2004.

The 2004 sampling was designed to allow detailed analysis of the spatial continuity, trends and anisotropy in the study area. The 2007 sampling campaign was influenced by the 2004 findings.

The 2007 data was studied using the whole data set with/without land use, with/without topography. Topography was found to be an influence on Ra226 levels but, since most sampling is carried out on lower elevations, not significant enough to use the more complex estimation methods. A subset of the 2007 data containing only stations which were sampled in 1996 and 2002 – 39 location – was also studied. It is considered that the smaller data set is insufficient for reliable spatial characterisation of the study area.

From this current study, we find that land use affects the results for Ra226 found in the soil samples. Areas classified as Native or Pasture show relatively elevated levels of Ra226 over those areas which are classified as Tilled. It is recommended that future sampling is altered slightly to take account of land usage. Fewer samples could be taken in Tilled areas with Native and other undisturbed ground more densely sampled than currently.

The 2007 evaluation shows an overall decrease in Ra226 levels of 20 to 30% on average compared to 2004. The percentage of the study area which exceeds the level of concern of 3.7 pCi/g dw is 25 to 28% lower than in 2004. The average value found above this level is 4 to 5% lower in 2007 than in 2004 if the complete data sets are used. If only the 39 original stations are considered, the value above 3.7 pCi/g dw **increases** by 5% in 2007.

Table 1: summary statistics

Exceedance level = 3.7	data sets			grid estimates		
	average value	average above 3.7	percentage above 3.7	average value	average above 3.7	percentage above 3.7
1996 39 stations	3.96	9.05	26.3	3.15	5.19	19.0
2002 39 stations	2.87	7.09	21.1	2.08	4.35	1.4
2004 39 stations	3.35	6.30	30.8	2.69	4.14	6.5
2007 39 stations	2.73	6.91	21.1	2.08	4.38	1.8
2004 all stations	2.88	6.17	21.3	2.52	4.47	9.7
2004 all stations and land use boundaries				2.61	4.51	13.8
2007 all stations	2.10	7.01	10.3	1.80	4.29	2.4
2007 all stations and land use boundaries				1.92	4.30	3.5

Available sampling data

Three previous sampling campaigns in 1996, 2002 and 2004 have provided information on the necessary density of sampling and directions in which sampling should be extended for useful information. The 2007 campaign provided 145 samples in the main study area around the plant. Figure 1 shows the location of the sample sites around the central void of the plant.

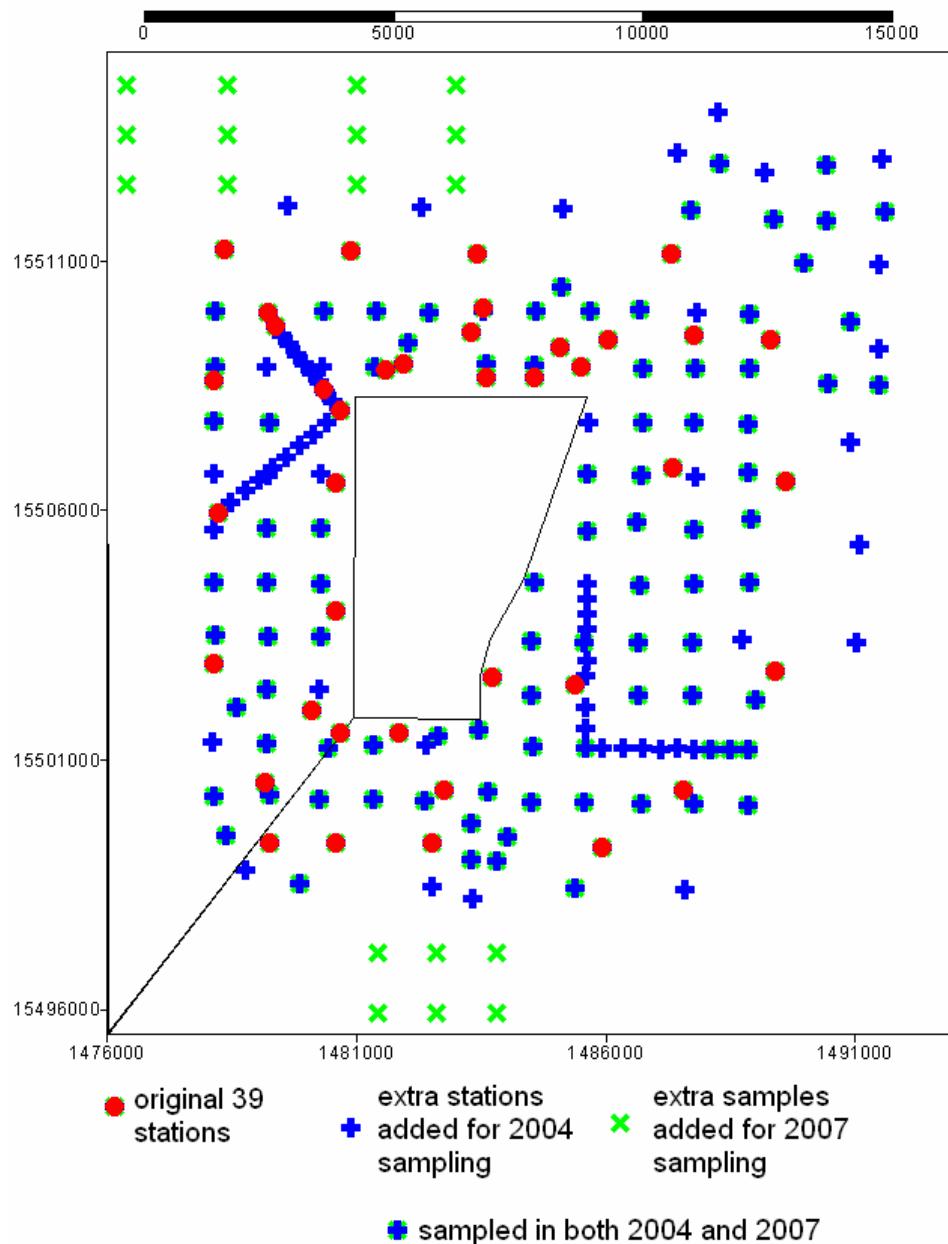


Figure 1: sampling schemes showing date of collection

The previous study of the 2004 data suggested that the apparent levels of Ra226 differed significantly with land use type. Native and undisturbed ground show much higher levels

than tilled land. Since sampling is taken from the upper layers of soil, measurements are likely to be affected by tilling of any kind. In this study, polygons were provided for three major land use types: Native, Pasture and Tilled. Samples were allocated land use codes. Mapping was carried out with and without land use information and comparisons made.

A topographic digital terrain model was also supplied. All of this information is summarised in Figure 2. (If this figure is difficult to view, please refer to Figure 3: *Surface Soil Sampling Locations, Topography, and Land Use in the Vicinity of the Plant, 2007* in the main body of this report, for a larger scale and clearer version of the map from which this was derived).

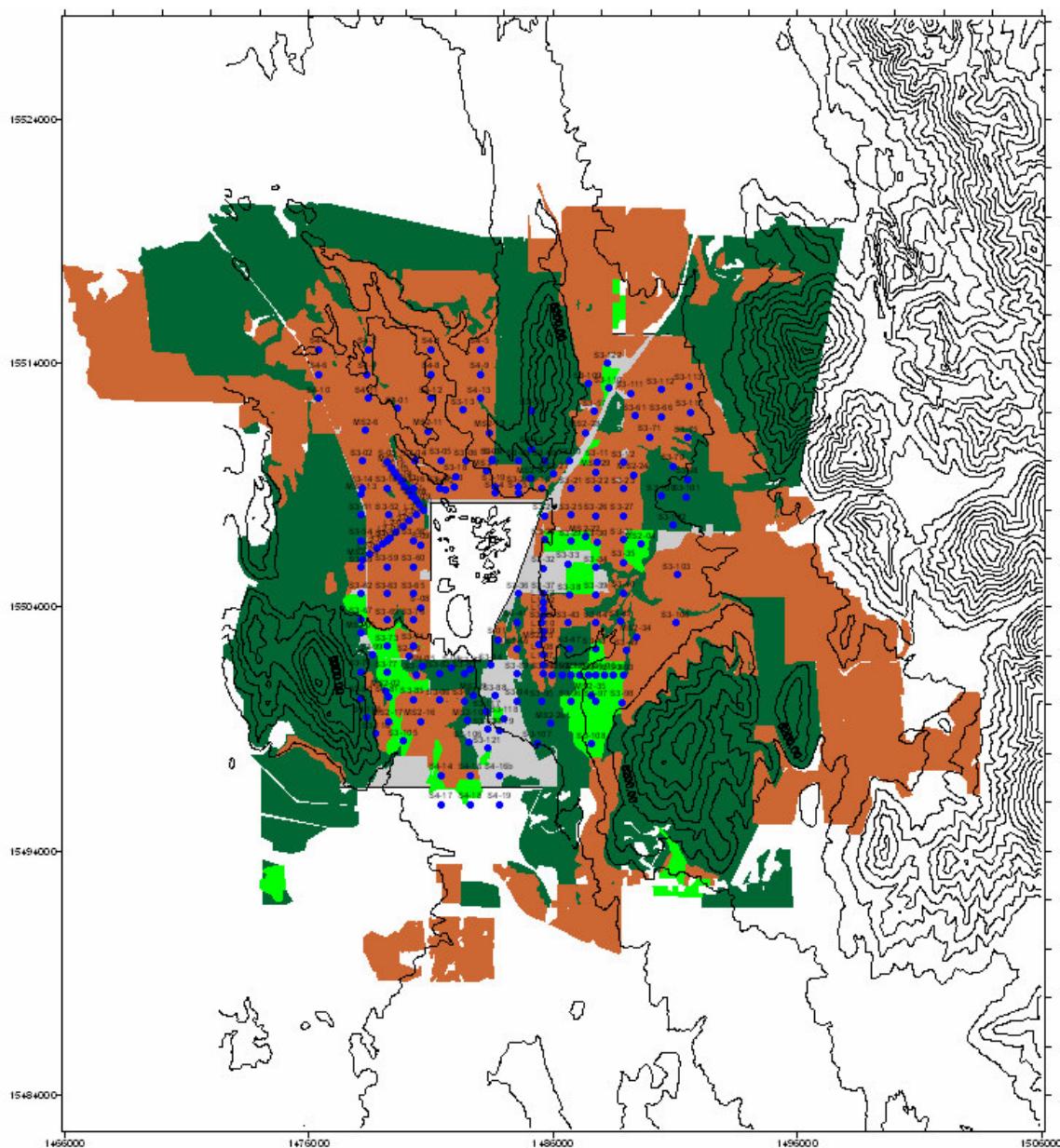


Figure 2: Land use polygons, topography and sampled locations

Since the deposition of Ra226 is probably affected by wind strength and direction, a wind rose was provided. However, time constraints prevented this information being included in the analysis. It is hoped, however, that the design of the next monitoring study may be guided by this additional information.

A geostatistical study of the 2007 data including the topography as an “external drift” was undertaken. It is fairly certain that topography affects the Ra226 levels. However, since almost all of the sampling lies in the valley, the impact of the topography is of limited use in the mapping exercise.

Comparison of 2007 sampling with previous campaigns

A scatterplot of the values found in the 2007 sampling (the x-axis) against those found at the same sites in previous monitoring exercises (the y-axis). Note one apparent extreme low value. At the date of this report, no reason has been found to exclude this sample from the study.

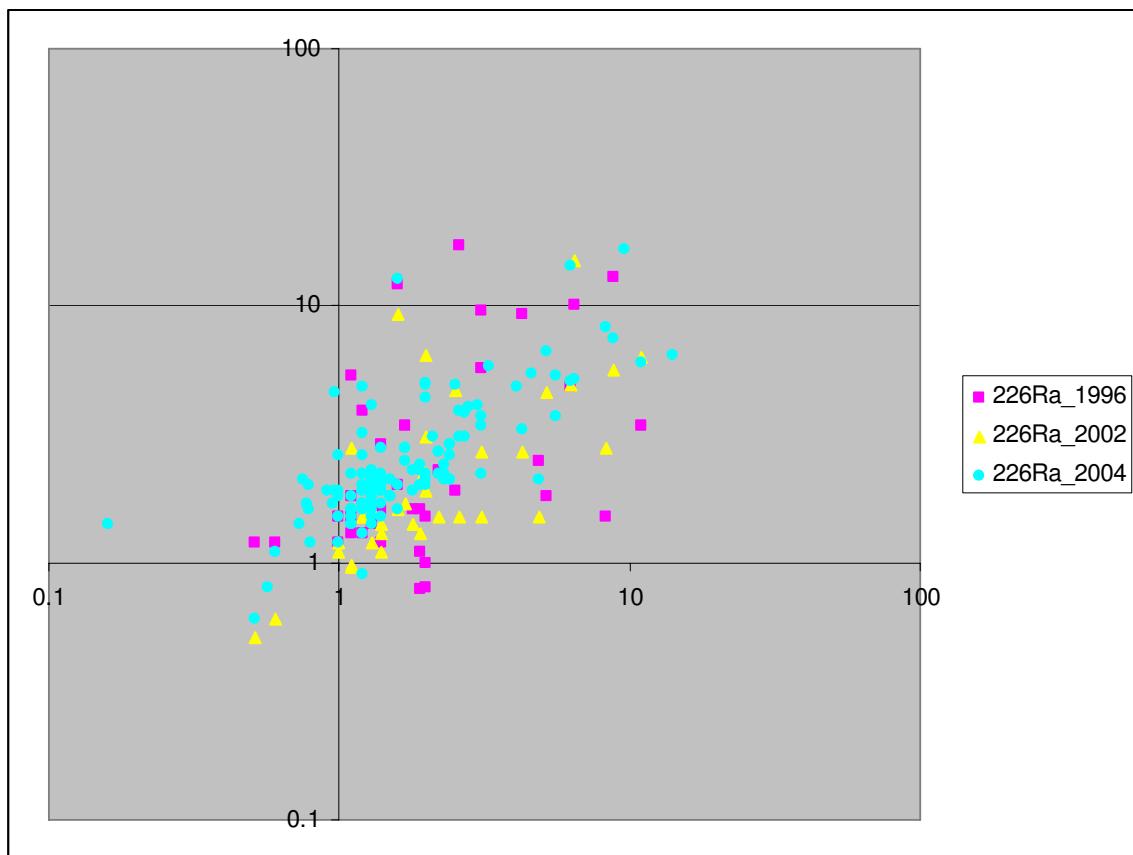


Figure 3: 2007 sampling compared to previous years' results (logarithmic scales)

A simple comparison of the data sets shows that values in 2007 are lower than those in any other year. Table 1, column 1 shows the average value of sampling for each year. A comparison is also included which compares only those 39 sample sites taken in the 1996 and 2002 campaigns.

The recommended level of concern for Ra226 in this study was given as 3.7 pCi/g dw.

Table 1 shows the percentage of the samples taken which exceed this value in each case. The 2007 complete data set shows only 10% of samples above the level of concern. However, if we consider only the 39 sample sites included in the earlier campaigns, this percentage rises to over 21% of the samples.

Table 1 also shows the average value of those samples which exceed the level of concern. Whether the whole data set or the subset of 39 samples are considered, the average value for 2007 exceeds that of the 2004 sampling.

It is felt that such direct comparisons may be misleading, for three reasons:

- If the total data sets are considered, they do not cover the same geographical extent within the study area;
- If only the 39 samples are compared, the confidence in the statistics which have been calculated is far less than desirable;
- In any case, the sampling information is not spread uniformly over the study area. Even allowing for the void caused by the plant boundary, the remainder of the area is not uniformly sampled. In 2004, nested closer sampling was taken to provide extra information for geostatistical modelling – causing clustering in the data. In 2007, the sampled area has been extended to the north-west and to the south.

A simple strategy to avoid this uneven weighting of sample information is to produce a regular grid of estimated values such as that used commonly for mapping. Maps were produced for:

- 1996 campaign, 39 samples
- 2002 campaign, 39 samples
- 2004 campaign, only using the 39 previously sampled locations
- 2004 campaign, using all of the 188 samples collected
- 2004 campaign, using all 188 samples but dividing the mapped area by land use code – that is, only samples with the correct land use code were used to estimate the grid points within the land use polygons. Where no land use information has been supplied, all samples are used.
- 2007 campaign, using only the 39 previously sampled locations
- 2007 campaign, using all 145 samples collected (including low outlier)

- 2007 campaign, using all 145 samples and land use information

Lognormal kriging was used for the mapping as in 2004, using the semi-variogram model developed in 2004. This model was validated against the 2007 sampling before mapping was carried out. Cross validation statistics were not as good as those achieved with 2004 data, but within acceptable limits when land use data was included in the kriging. With this option, only samples with similar land use codes are used in the validation exercise.

Cross validation 2004 semi-variogram model	Average error statistic	Standard deviation of errors	Average of samples	Average of estimates
1996 39 stations	0.093	2.343	4.229	3.300
2002 39 stations	0.092	2.265	2.032	2.449
2004 39 original stations	-0.114	1.852	3.346	2.944
2004 all samples	0.032	1.401	2.883	2.662
2004 all samples and land use information	0.043	0.973	2.913	3.040
Ideal behaviour	0.000	1.000	True average	equals true average
2007 39 original stations	0.158	1.756	2.734	2.192
2007 all samples	0.033	1.474	2.102	1.887
2007 all samples and land use information	0.069	1.270	2.034	1.881

As in 2004, a grid spacing of 200 by 200 feet was selected. Each grid point was compared to the land use polygons, to determine the likely land use at that point. Grid points were not included in the results if they failed to pass the *ygiagam* criterion – that is, where the kriging estimate is no better than simply using the regional average value. Grid files were written and transferred to Excel spreadsheets for detailed study.

These grids were then investigated in various ways, including calculating the difference between campaigns, applying levels of concern and simple summary statistics. Details are given in the body of this report. Table 1 shows the final results for average over the whole grid and for average and percentage above the level of concern.

Figure 4 overleaf shows the maps produced using all of the 2007 sampling data with and without the land use information. It is recommended that any future sampling campaigns should take into account the local land use in placing sample locations.

Also shown in Figure 4 is a map produced using only 2007 data which has been collected at sites used in 1996 and 2002. It can be seen that this map has little local detail on contours compared with the maps produced using 145 samples. If only the original 39

Monsanto Geostatistics March 2008

location are used for mapping, little reliance can be placed on the actual location of the contours on the map.

The land use codes are also shown, along with the 145 sample sites for the 2007 campaign.

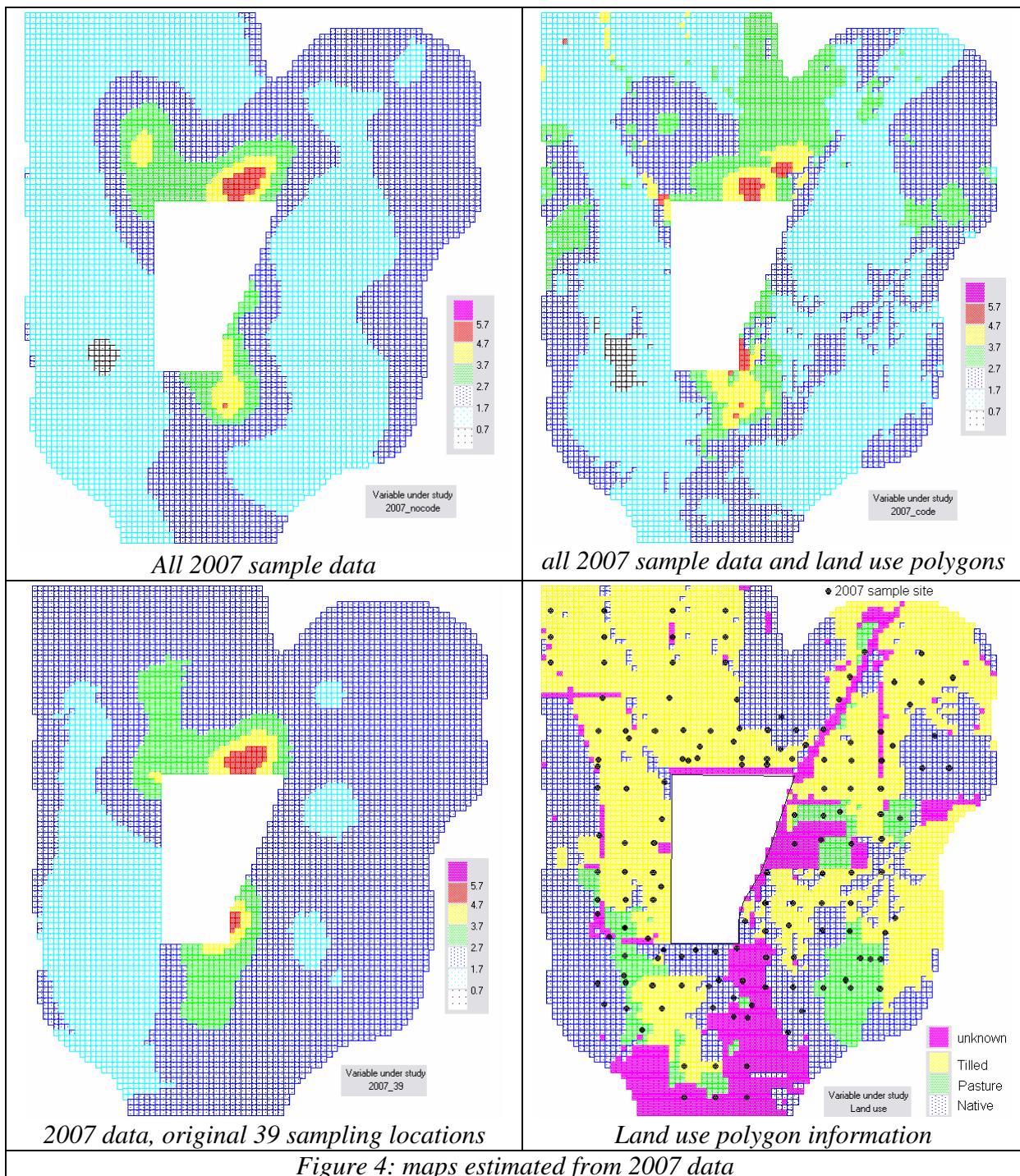


Figure 4: maps estimated from 2007 data

The impact of including the land use data is obvious from the above maps. As an example, consider the north-western area. One single high value sample in an untilled area is ‘smeared’ across 100 acres of tilled ground when land use classification is ignored.

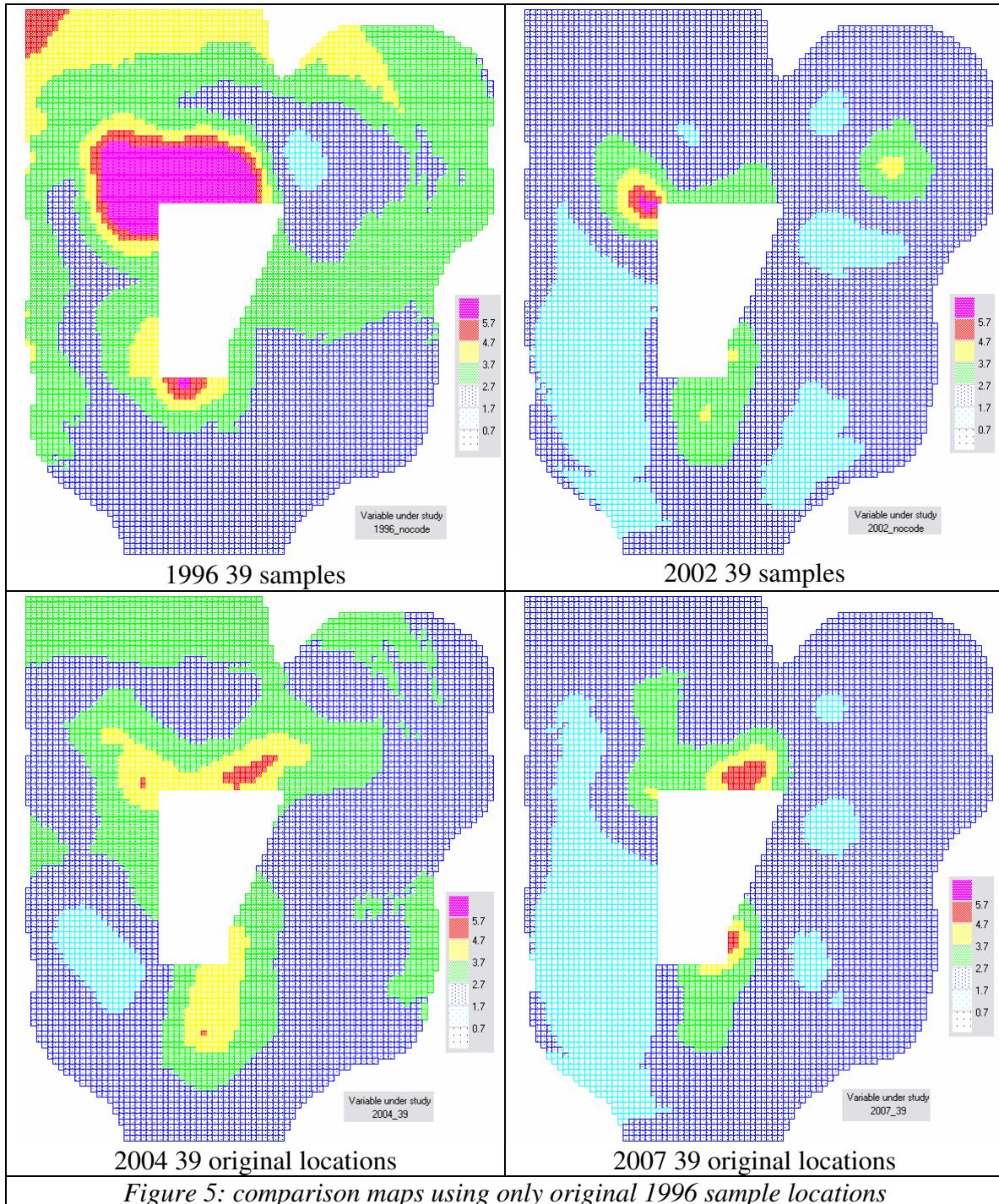


Figure 5: comparison maps using only original 1996 sample locations

Figure 5 above shows a direct comparison between the 4 sampling campaigns using only the common sampling locations. These maps give a broad scale idea of the pattern of Ra226 deposition, but are not reliable for any local information or confidence on contour locations.

Kriging with topographic control

There is a variation on the kriging technique which allows for the inclusion of a background feature which may control the quantity of Ra226 which is deposited.

The wind direction and strength seems to play a part in the deposition, but time prevented investigation of this factor.

Comparison of the 2004 maps with local topography suggested that this may be a factor. A digital terrain model was provided and tied to the mapping grid. This was included in the kriging of the map as an “external drift”. At this time the technique could not be combined with the land use coding. The following example is, therefore, limited to mapping without land use code.

Figure 6 shows a comparison between the 2007 map kriged without land use and the same map kriged without land use but with topographic “external drift”. It would seem that there is little extra information available when including the topographic data. This may simply be because the bulk of the sampling is taken on fairly level ground.

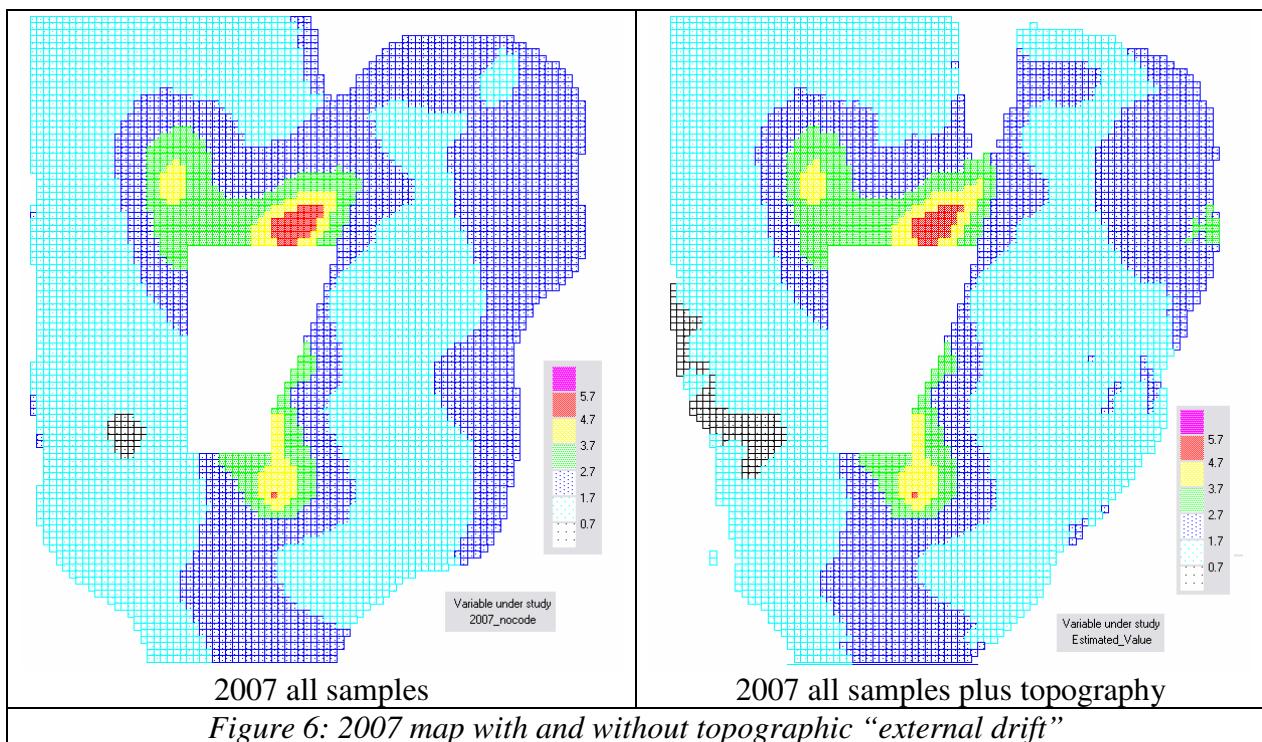


Figure 6: 2007 map with and without topographic “external drift”

APPENDIX D

P₄ Production, LLC

Soda Springs Plant
1853 Highway 34
P.O. Box 816
Soda Springs, Idaho 83276-0816
Phone: (208) 547-4300
Fax: (208) 547-3312

December 23, 1999

CERTIFIED MAIL

Mr. Wallace Reed
U.S. EPA Region 10
1200 Sixth Avenue, ECL-115
Seattle, Washington 98101

cc: J.P. Hyland, Solutia-St. Louis
D.K. Wilson, Solutia-St. Louis
R.L. Simmons, Solutia-Soda Springs
D.W. Farnsworth, Solutia-Soda Springs
G.R. MacIlwraith, Solutia-Soda Springs
R.C. Budge, Racine, Olson, Nye, Budge and Cooper
W.E. Wright, Montgomery Watson

Dear Mr. Reed,

Attached is a copy of the Environmental Protection Easement and Declaration of Restrictive Covenants that is associated with the plant site and property surrounding the Solutia (Monsanto) facility in Soda Springs, Idaho.

These easements and restrictive covenants were recorded on December 22, 1999, as official records at the Caribou County Courthouse. The conditions and restrictions, as agreed to by EPA Region 10 and P₄ Production, L.L.C. will apply to and run with the property as required by EPA's Record of Decision for the Monsanto Soda Springs, Idaho superfund site.

Efforts to monitor environmental conditions and the approved uses associated with these properties in order to assure protection to human health and the environment will continue.

If you have any questions regarding this significant milestone, please contact me.

Sincerely,



Robert L. Geddes
Superfund Project Manager

Enclosure

160535

STATE OF IDAHO
County of Caribou
Date: 12/22/99
Time: 9:45 AM
Official Records
Recorder: Edie Izatt
Deputy: Edie Izatt
Fee: 33.00

ENVIRONMENTAL PROTECTION EASEMENT
AND
DECLARATION OF RESTRICTIVE COVENANTS

This Environmental Protection Easement and Declaration of Restrictive Covenants (hereinafter "Agreement") is granted by P4 PRODUCTION, L.L.C., whose address is P.O. Box 816, Soda Springs, Idaho 83276 ("Grantor"), in favor of SOLUTIA INC., whose address is 10300 Olive Boulevard, St. Louis, Missouri 63166-6760, and MONSANTO, whose address is 800 N. Lindbergh Boulevard, St. Louis, Missouri 63167 ("Grantee"). Grantor being the owner of the real property located in Caribou County, Idaho, described in Exhibit "A" attached hereto and incorporated by reference as if set forth fully (the "Property"), for valuable consideration paid by Grantee, the receipt and sufficiency of which are hereby acknowledged, hereby Grants to Grantee an environmental protection easement and adopts the covenants, conditions and restrictions set forth herein which shall apply to and run with the Property.

1. **Background, Purpose.** The Property is located at or near the site of an elemental phosphorus plant near Soda Springs in Caribou County, Idaho (the "Facility") that was previously owned and operated by Monsanto Company from 1952 until 1997, and is now owned by Grantor and operated by Solutia Inc., as successors in interest. The covenants, conditions and restrictions set forth herein are necessary to ensure the development and use of the Property in a manner consistent with the current environmental law and the use and character of Grantee's Facility.

2. **Restrictive Covenant.** The Property shall not be used or developed for any residential use, including but not limited to single and multiple family dwelling units and other facilities used for living quarters. Additionally, affected ground water underlying the property shall not be consumed until EPA certifies that ground water beneath the Property meets the Performance Standards.

3. **Environmental Protection Easement.** Grantor grants to Grantee, the United States, the State of Idaho and their representatives, including, but not limited to, EPA and its contractors,

160535

a continuing right of access to the Property to enforce the land use restrictions and conduct any related activity required by the RD/RA Consent Decree entered on June 29, 1998 in the United States District Court for the District of Idaho, in the matter of the United States of America, Plaintiff, v. Monsanto Company and P4 Production L.L.C., Defendants, Civil Action No. 98-154, recorded December 18, 1998, in the Public Land Records in the Office of the County Recorder of Caribou County, Idaho, as Recorder's Instrument No. 158132.

4. **No Public Access or Use.** The property will not be open to public access or use. Grantee may construct and maintain, at their expense, such fences, gates and signs as may be necessary to prevent public access or use. Access and use shall be limited to Grantor, Grantee, and their agents, representatives and employees.

5. **Application.** All real estate, lots, parcels or portions thereof located within or on the Property, and any conveyance or transfer covering or describing any part thereof, shall be subject to the environmental protection easement, covenants, conditions and restrictions contained herein. By acceptance of such conveyance or transfer, each transferee or grantee and each of their heirs, successors, transferees or assigns agrees with Grantor and each other to be bound by the covenants, conditions and restriction contained herein.

6. **Partial Resale, Lease or Sublease.** The sale, subdivision, leasing and subleasing of a portion of the Property shall be prohibited unless each such portion resulting from such sale, subdivision, leasing or subleasing meets all of the requirements contained herein and contained in any applicable, valid governmental ordinances and regulations.

7. **Notice Requirement.** Grantor agrees to include in any instrument conveying any interest in any portion of the property, including but not limited to deeds, leases and mortgages, a notice which is substantially in the following form:

NOTICE: The interest conveyed hereby is subject to the effect of: (1) an Environmental Protection Easement and Declaration of Restrictive Covenants, dated 12-22-99, 1999, recorded in the Public Land Records in the Office of the County Recorder of Caribou County, Idaho, as Recorder's Instrument No. 160535; and, (2) the RD/RA Consent Decree entered on June 29, 1998 in the United States District Court for the District of Idaho in the matter of the United States Of America, Plaintiff, v. Monsanto Company and P4 Production, L.L.C., Defendants, Civil Action No.98-154, recorded

December 18, 1998, in the Public Land Records in the Office of the County Recorder of Caribou County, Idaho, as Recorder's Instrument No. 158132.

Within thirty (30) days of the date any such instrument of conveyance is executed, Grantor must provide Grantee with a certified true copy of said instrument and, if it has been recorded in the Public Land Records, its recording reference.

8. **Enforcement.** The environmental protection easement and restrictive covenants granted herein are contractual in nature. Grantor, Grantee and any person, corporation or other entity who hereafter asserts or claims any right, title, claim or interest in and to the Property, whether as successor in title or otherwise and whether voluntarily or by operation of law, and any person, corporation or other entity claiming by, through or under Grantor or Grantee, or their heirs, assigns or successors, or any of them severally, shall have the right to enforce the restrictions contained in this Agreement and to proceed at law or in equity to compel compliance with or prevent the violation or breach of the terms hereof. The prevailing party in any action to enforce any provision of this Agreement shall be entitled to recover all costs of such action, including reasonable attorney fees.

9. **Reserved Rights.** Grantor reserves all rights and privileges in and to the use of the property which are not incompatible with the restrictions granted herein.

10. **Notices.** Any notice, demand, request, consent, approval or communication that either party desires or is required to give shall be in writing and shall either be served personally or sent by first class mail postage prepaid at the address above indicated for each party.

11. **General Provisions.**

11.1 **Controlling Law.** The interpretation and enforcement of this Agreement shall be governed by the laws of the State of Idaho.

11.2 **Binding Effect.** This Agreement shall remain in full force and effect, run with the land and bind all persons obtaining or succeeding to an interest in the Property after the date hereof until released. Grantee may release this Agreement in full or in part at any time consistent with U.S. Environmental Protection Agency requirements.

11.3 Severability. The determination that any provision of this Covenant is invalid shall not affect any other provision of this Covenant and the other provisions of this Covenant shall remain in full force and effect.

11.4 No Forfeiture. No waiver of the breach of any provision of this Agreement shall constitute a waiver of a subsequent breach or forfeiture of any provision. No right of action shall accrue for or on account of the failure of any person to exercise any right created by this Agreement nor for imposing any provision, condition, restriction or covenant which may be unenforceable.

11.5 Liberal Construction. This Agreement shall be liberally construed to affect the purpose of this instrument. If any provision of this instrument is found to be ambiguous, an interpretation consistent with the purpose of this instrument that would render the provision valid shall be favored over any interpretation that would render it invalid.

11.6 Entire Agreement. This instrument sets forth the entire agreement between the parties with respect to the rights and restrictions created hereby, and supersedes all prior discussions, negotiations, understandings, or agreements relating thereto, all of which are merged herein.

IN WITNESS WHEREOF, GRANTOR HAS EXECUTED THIS AGREEMENT THIS
3 DAY OF December, 1999.

GRANTOR:

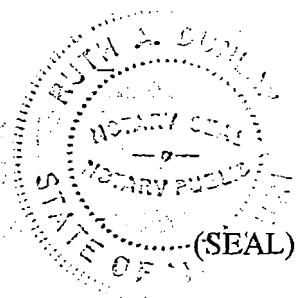
P4 PRODUCTION, L.L.C.

By 
wPL
—
Vice President

160535

I certify that I know or have satisfactory evidence that Marty Blaylock
_____Marty Blaylock is the person who appeared before me, that said person
acknowledged that he signed this instrument on behalf of MONSANTO COMPANY, and that the
signing of the instrument was his free and voluntary act.

Given under my hand and official seal this 3rd day of December, 1999.



Ruth A. Dunlap

NOTARY PUBLIC FOR:

Residing at: 4867 Margareta

My Commission Expires: Notary Public, State of Missouri
St. Louis City

My Commission Expires 11/17/2001

160535

MISSOURI
STATE OF ~~IDAHO~~)
St. Louis : ss
County of ~~Caribou~~)

I certify that I know or have satisfactory evidence that Dennis Cawner _____ is the person who appeared before me, that said person acknowledged that he signed this instrument on behalf of SOLUTIA INC., and that the signing of the instrument was his free and voluntary act.

Given under my hand and official seal this 2nd day of December, 1999.

Joani M. Madden

NOTARY PUBLIC FOR ~~IDAHO~~ MISSOURI

Residing at:

My Commission Expires:

JOANI M. MADDEN
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES JUNE 29, 2000
~~ST. CHARLES COUNTY~~

160535

GRANTEE'S ACCEPTANCE

Grantee, Solutia Inc., hereby accepts the foregoing grant of Environmental Protection Easement and Declaration of Restrictive Covenants and agrees to be bound by the terms and conditions thereof.

SOLUTIA INC.

By

Print Name: DENNIS CAVNER

Title: V.P. Operations Excellence

MONSANTO COMPANY

By M E Blaylock JAN
Print Name: M E Blaylock

Title: V P Manufacturing Operations

160535

STATE OF MISSOURI)
County of St. Louis) ss

I certify that I know or have satisfactory evidence that AIAN W. Seder _____ is the person who appeared before me, that said person acknowledged that he signed this instrument on behalf of P4 PRODUCTION, L.L.C., and that the signing of the instrument was his free and voluntary act.

Given under my hand and official seal this 30 day of December, 1999.

(SEAL)

NOTARY PUBLIC FOR MISSOURI

Residing at:

My Commission Expires:

MARY K. MC BRIDE
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES 2/12/2002
ST. LOUIS COUNTY

EXHIBIT "A"

DESCRIPTION OF REAL PROPERTY IN CARIBOU COUNTY, IDAHO, SUBJECT
TO ENVIRONMENTAL PROTECTION EASEMENT AND
DECLARATION OF RESTRICTIVE COVENANTS

TOWNSHIP 8 SOUTH, RANGE 42 EAST OF THE BOISE MERIDIAN:

SECTION 29: W $\frac{1}{4}$ SW $\frac{1}{4}$, ALSO, ALL THAT PORTION OF THE SE $\frac{1}{4}$ SW $\frac{1}{4}$ LYING WESTERLY OF THE
WESTERLY RIGHT OF WAY LINE OF STATE HIGHWAY NO. 34.

SECTION 30: LOTS 2 AND 3, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$

EXCEPT THEREFROM, A STRIP OF LAND 50 FEET WIDE, BEING 25 FEET ON EACH SIDE OF THE
CENTERLINE LYING OVER AND ACROSS THE SE $\frac{1}{4}$ NE $\frac{1}{4}$ OF SECTION 25, TOWNSHIP 8 SOUTH, RANGE
41 EAST OF THE BOISE MERIDIAN, AND OVER AND ACROSS LOTS 2 AND 3, AND THE NE $\frac{1}{4}$ SW $\frac{1}{4}$ OF
SECTION 30, TOWNSHIP 8 SOUTH, RANGE 42 EAST OF THE BOISE MERIDIAN, SAID CENTERLINE
BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE WEST FENCE LINE OF GRANTOR'S LAND, WHICH POINT IS 25 FEET
SOUTH OF THE INTERSECTION OF THE SAID WEST FENCE LINE WITH THE NORTH LINE OF THE
SAID SE $\frac{1}{4}$ NE $\frac{1}{4}$ OF SAID SECTION 25, AND 1285 FEET, MORE OR LESS, WEST OF THE EAST LINE OF SAID
SECTION 25, AND RUNNING

THENCE EASTERLY, PARALLEL TO AND 25 FEET DISTANCE SOUTHERLY FROM THE SAID NORTH
LINE OF SAID SE $\frac{1}{4}$ NE $\frac{1}{4}$ OF SAID SECTION 25 AND 25 FEET DISTANT SOUTHERLY FROM AND
PARALLEL TO THE NORTH LINE OF LOT 2 OF SAID SECTION 30, TO A POINT 25 FEET WEST OF THE
WESTERLY BASE OF A LAVA REEF IN THE NORTHEASTERLY PORTION OF SAID LOT 2;

THENCE SOUTHEASTERLY PARALLEL TO AND 25 FEET DISTANT WESTERLY FROM THE BASE OF
SAID LAVA REEF TO THE SOUTHERLY SURFACE END OF SAID LAVA REEF;

THENCE CONTINUING SOUTHEASTERLY TO AND AROUND AND 25 FEET DISTANT FROM THE
SOUTHERLY AND WESTERLY SIDE OF A SECOND LAVA REEF SITUATED IN OR NEAR THE
SOUTHEAST CORNER OF SAID LOT 2 AND IN OR NEAR THE NORTHEAST CORNER OF SAID LOT 3 OF
SAID SECTION 30;

THENCE SOUTHEASTERLY BETWEEN TWO ADDITIONAL LAVA REEFS TO A POINT 25 FEET EAST OF
THE EASTERLY SIDE THEREOF;

THENCE RUNNING NORTHEASTERLY TO A POINT 25 FEET SOUTH OF THE NORTH LINE OF SAID
NE $\frac{1}{4}$ SW $\frac{1}{4}$ OF SAID SECTION 30;

THENCE EASTERLY PARALLEL TO AND 25 FEET DISTANT SOUTHERLY FROM THE SAID NORTH LINE
OF SAID NE $\frac{1}{4}$ SW $\frac{1}{4}$ OF SAID SECTION 30, TO A POINT 25 FEET WEST OF THE EAST FENCE LINE OF
GRANTOR'S LAND IN THE SAID NE $\frac{1}{4}$ SW $\frac{1}{4}$ OF SAID SECTION 30;

160535

THENCE SOUTHERLY, PARALLEL TO AND 25 FEET DISTANCE WESTERLY FROM SAID EAST FENCE LINE OF GRANTOR'S LAND TO THE SOUTH LINE OF THE SAID NE $\frac{1}{4}$ SW $\frac{1}{4}$ OF SAID SECTION 30, TOWNSHIP 8 SOUTH, RANGE 42 EAST OF THE BOISE MERIDIAN, EXCEPTING ANY PROPERTIES LYING WITHIN THE COUNTY ROAD RIGHT OF WAYS.

SECTION 31: E $\frac{1}{2}$

SECTION 32: ALL THAT PORTION OF THE NW $\frac{1}{4}$ AND THE W $\frac{1}{4}$ SW $\frac{1}{4}$ LYING WESTERLY OF THE WESTERLY RIGHT OF WAY OF STATE HIGHWAY 34 AS THE SAME NOW EXISTS.

ALSO, BEGINNING AT THE SOUTHWEST CORNER OF SECTION 32; THENCE NORTH 00°33'26" EAST 60 FEET TO A FOUND 5/8" REBAR, THE TRUE POINT OF BEGINNING, AND RUNNING

THENCE NORTH 00°25'51" WEST 654.08 FEET ALONG THE EAST RIGHT OF WAY LINE OF HIGHWAY NO. 34 TO A HIGHWAY RIGHT OF WAY MONUMENT, WHICH IS THE P.C. OF A 1860.00 FOOT RADIUS CURVE TO THE RIGHT;

THENCE NORTHERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 02°05'01", AN ARC LENGTH OF 67.64 FEET, THE CHORD OF WHICH BEARS NORTH 01°17'53" EAST, AND HAVING A CHORD DISTANCE OF 67.64 FEET TO A POINT OF TANGENCY, WHICH IS A 5/8" REBAR WITH CAP LABELLED "A.A. HUDSON PLUS 4735";

THENCE SOUTH 37°20'30" EAST 804.98 FEET TO A 5/8" REBAR WITH CAP;

THENCE SOUTH 16°32'26" EAST 81.09 FEET TO A FOUND 5/8" REBAR;

THENCE SOUTH 90°33'07" WEST 507.99 FEET, TO THE TRUE POINT OF BEGINNING.

ALSO, A TRACT OF LAND 200 FEET IN WIDTH, ADJOINING THE WESTERLY SIDE OF THE CONDA-SODA SPRINGS RAILROAD RIGHT OF WAY AND RUNNING NORTHWESTERLY THEREFROM TO AND ADJOINING THE EASTERLY SIDE OF STATE HIGHWAY NO. 34 AND SITUATED IN THE SW $\frac{1}{4}$ SW $\frac{1}{4}$ OF SECTION 32, AND FURTHER DESCRIBED AS SITUATED 100 FEET ON EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE, TO-WIT:

BEGINNING AT A POINT ON THE WEST BOUNDARY LINE OF SAID CONDA-SODA SPRINGS RAILROAD RIGHT OF WAY LOCATED 439 FEET EAST AND 358 FEET NORTH OF THE SOUTHWEST CORNER OF SAID SECTION 32, AND RUNNING

THENCE NORTHWESTERLY TO A POINT 933.4 FEET NORTH OF SAID SOUTHWEST CORNER OF SECTION 32, WHICH LAST POINT INTERSECTS THE EASTERLY BOUNDARY LINE OF SAID STATE HIGHWAY NO. 34.

TOWNSHIP 9 SOUTH, RANGE 42 EAST OF THE BOISE MERIDIAN:

SECTION 6: LOTS 1, 2, AND 3
EXCEPT THEREFROM, THE FOLLOWING TRACT:

BEGINNING AT THE POINT OF INTERSECTION OF THE WEST LINE OF STATE HIGHWAY NO. 34, AND THE SOUTH LINE OF HOOPER SPRINGS ROAD, WHICH POINT IS APPROXIMATELY 36 FEET WEST AND 100 FEET SOUTH FROM THE NORTHEAST CORNER OF SAID SECTION 6; THENCE CONTINUING SOUTH ALONG THE WESTERLY RIGHT OF WAY LINE OF SAID HIGHWAY NO. 34, A DISTANCE OF 203.7 FEET, TO THE TRUE POINT OF BEGINNING, AND RUNNING

160535

THENCE CONTINUING SOUTH ALONG THE WESTERLY RIGHT OF WAY LINE OF HIGHWAY NO. 34, A DISTANCE OF 1011.3 FEET, MORE OR LESS, TO THE SOUTH LINE OF THE NE $\frac{1}{4}$ NE $\frac{1}{4}$ OF SAID SECTION 6;

THENCE WEST ALONG SAID SOUTH LINE 440 FEET;

THENCE NORTH 1011.3 FEET;

THENCE EAST 440 FEET, TO THE POINT OF BEGINNING.
EXCEPTING ANY PROPERTIES LYING WITHIN THE COUNTY ROAD RIGHT OF WAYS.

CONTINUATION PAGE

Commitment

STAND-LL.CMT

6/24/96

APPENDIX E

P4 Production, LLC

Robert Geddes
Soda Springs Plant
1853 Highway 34
P.O. Box 816
Soda Springs, Idaho 83276-0816
Phone: (208) 547-1234
Fax: (208) 547-3312

July 3, 2008

Mark Ader
Environmental Cleanup Office (ECL-115)
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

**Re: Five-Year Review
CERCLA Record of Decision
P4 Production, LLC Soda Springs Plant**

Dear Mr. Ader:

You asked that P4 Production, LLC (“P4”) provide information related to the Five-Year Review of the CERCLA Record of Decision (“ROD”) for P4’s plant in Soda Springs, Idaho (the “Plant”). Specifically, you requested information that addresses the requirement in the ROD that the Five-Year Review “verify that operations continue to be in compliance with environmental (CAA, IDAPA, CWA, RCRA) and worker health and safety requirements *so that potential releases and exposures remain adequately controlled* and the remedy remains effective.”

As stated in the ROD, EPA concluded that “as of August, 1996, ... the Plant is in compliance with the Resource Conservation and Recovery Act (RCRA), the Clean Air Act (CAA), the Toxic Substances Control Act (TSCA), and the National Pollutant Discharge Elimination System (NPDES). In addition, the Monsanto Plant has received awards from the Occupational Safety and Health Administration (OSHA) because of its implementation of worker safety programs, compliance with OSHA regulations, and worker safety record.” In the first Five-Year Review, dated September 30, 2003, EPA did not note any change to this conclusion.

Since the date of the first Five-Year Review, P4 continues to operate its Soda Springs Plant in substantial compliance with all environmental, health and safety requirements. All permit and regulatory requirements that limit or control potential releases and exposures have been met. Additional information related to specific permit requirements follows.

Clean Air Act

As required by the Plant's Tier I permit, issued by the Idaho Department of Environmental Quality ("IDEQ") pursuant to the requirements of Title V of the Clean Air Act, annual compliance certifications have been submitted to IDEQ and EPA. There have been no deviations, excursions or other instances of noncompliance that would impair or adversely affect the effectiveness of the remedy.

Clean Water Act

As required by the Plant's NPDES permit, issued by EPA, all monthly discharge monitoring reports have been timely submitted and there have been no deviations or excursions.

Resource Conservation and Recovery Act

The Plant does not treat, store or dispose of any hazardous waste in a manner that requires a RCRA permit. The Plant has complied with all generator requirements, including manifest and related reporting requirements. Since the ROD was signed, the Plant has made no material changes to its method of handling solid or hazardous wastes, including secondary materials that would impair or adversely affect the effectiveness of the remedy.

Employee Health and Safety

The Plant remains in compliance with all applicable employee health and safety requirements so that the remedy remains effective. The Soda Springs Plant has installed a robust environmental management system and was certified as an ISO14001 facility in 2007. Among other things, the environmental management system includes a management system policy, system manual, numerous procedures, an environmental compliance self-evaluation, management reviews, a rigorous internal audit schedule, environmental aspect development and management, Plant-wide communication briefings and annual objectives and targets.

Very truly yours,



Robert L. Geddes